

# HANUMANT KRIPA EASY FINANCE PRIVATE LIMITED

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## ORGANIZATIONAL POLICIES

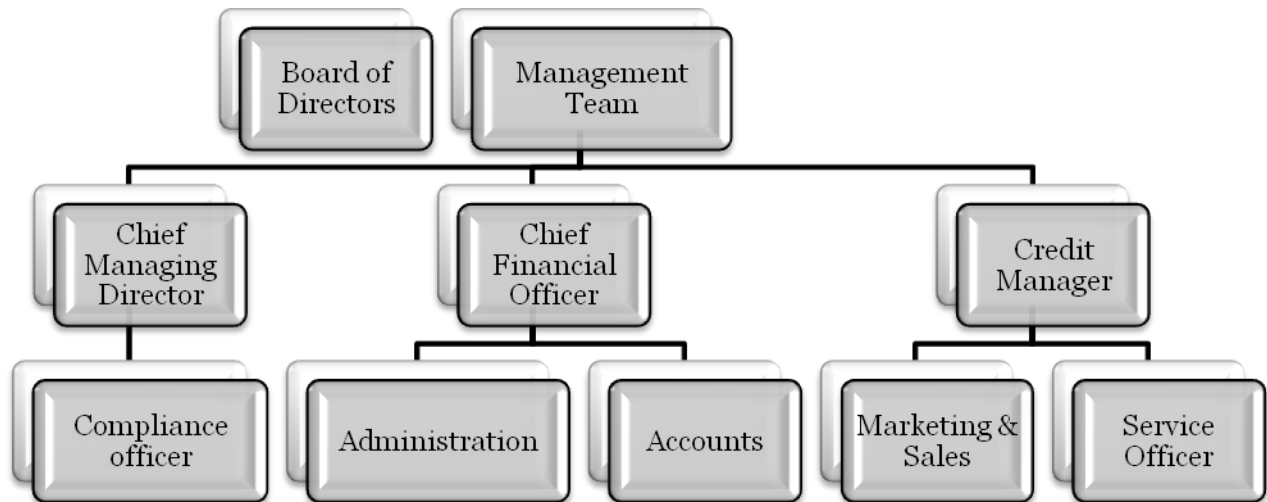
## ORGANIZATIONAL CHART

**HANUMANT KRIPA EASY FINANCE PRIVATE LIMITED**

**CIN U65990PB2018PTCo47591**

**Registered Office: Mit Ram, Jain Khatria Mohalla, SAMANA – 147101  
(Patiala) PUNJAB**

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## **BOARD OF DIRECTORS OF COMPANY**

1. Sumit Goel
2. Vanika Goyal

## **MANAGEMENT TEAM OF COMPANY**

- 1.

## **CHIEF MANAGING DIRECTOR OF COMPANY**

1. Sumit Goel
2. Vanika Goyal

## **CHIEF FINANCIAL OFFICER (CFO)**

- 1.

**Each person for Administration, Accounts, Credit Manager, and Marketing & Sales & Service Officer is required to appoint as per size of operation hence initial number of people along with their responsibilities, rank and duties, qualification, appointment date and so on to be provided.**

Credit Manager –

Marketing & Sales Head –

Compliance Head or Compliance Officer (CO) –

All other Profiles – To Be Recruited Soon

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY OF HANUMANT KRIPA EASY FINANCE PRIVATE LIMITED

### I. POLICY STATEMENT AND PURPOSE

1. We are committed to operate our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything we do. Our Company is committed to act professionally, fairly and with integrity in all its business dealings and relationships wherever it operates, and to implementing and enforcing effective systems to counter bribery. This includes compliance with all laws, domestic and foreign, prohibiting improper payments, gifts or inducements of any kind to or from any person, including officials in the private or public sector, customers and suppliers. Our Company is equally committed to the prevention, deterrence and detection of bribery and other corrupt business practices.
2. Bribery and corruption can take many forms including cash or gifts to an individual or family members or associates, inflated commissions, fake consultancy agreements, unauthorized rebates, non-monetary favors and false political or charitable donations. These actions may be undertaken directly or through a third party. It is illegal and immoral to, directly or indirectly, offer or receive a bribe.
3. We uphold all laws relevant to countering bribery and corruption applicable to us in the conduct of our business across all the jurisdictions in which we operate including, wherever applicable such as Indian **Prevention of Corruption Act, 1988 (“PCA”)**.
4. It would also be pertinent to note the impending amendments proposed to be introduced upon enactment of the Prevention of Corruption (Amendment) Bill in India which are intended to strengthen the legislative framework of the PCA and include:
  - Supply side of bribery (i.e. bribe giving) to be covered by making it a substantive offence under the PCA.

- A company could be held liable under the PCA as an offender if any person associated with the company gives a bribe. However, a company would be able to defend itself by proving that it had in place adequate procedures (such as a robust ABAC program) designed to prevent persons associated with it from undertaking such conduct; and
  - Every director, manager, secretary or other officer with whose “consent or connivance” the offence was committed, to be made liable under the PCA.
5. In addition to the PCA, following laws in India also presently apply to offences relating to or resulting in corruption and bribery and resolutions available in case of occurrence of corruption or bribery:
- Indian Penal Code, 1860 (“IPC”);
  - Prevention of Money Laundering, 2002;
  - Central Vigilance Commission Act, 2003;
  - Lok Ayukta Acts of various states.
6. The purpose of this model **Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”)** is to ensure that our Company sets up adequate procedures in order to prevent our Company’s involvement in any activity relating to bribery, facilitation payments, or corruption, even where the involvement may be unintentional. It requires employees, directors, officers of the Company and third parties subject to this ABAC Policy to recognize questionable transactions, behavior or conduct, and to take steps to record, comply and follow procedures set in place to deal with such behavior or conduct.
7. While an exhaustive list cannot be provided, set out below are indicative questionable transactions or situations that Designated Persons (as defined below) should be careful about – which or when appearing together or individually, should raise a red flag:
- A contract requires use of a third-party consultant where the third party’s principal or owner is a government official;
  - The business lacks qualifications or resources i.e. the potential business partner does not appear capable of performing the services being offered.
  - Any potential partner who provides guarantees of success or claims to have the

ability to obtain licenses or other government approval without providing a description of a legitimate manner by which those goals will be accomplished;

- Transactions involving unusual payment patterns or financial arrangements. Accordingly, a request to pay unusually high commissions is a warning sign of possible corruption. A request to deposit commissions in multiple bank accounts, perhaps in offshore banks, also justifies additional scrutiny;
- A potential counterparty who refuses to accept an ABAC or anti money laundering clause in the proposed contract;
- Based on pre-acquisition / counterparty due diligence, it becomes apparent that the potential counterparty has a reputation for offering bribes or violating other laws or indulging in unusual structured transactions;
- Inflated payouts to, or questionable role in the project of potential counterparty or its affiliate;
- A proposed counterparty resists or fails to provide details of parentage or has undisclosed principals, associates or subcontractors with whom it splits fees;
- A proposed counterparty refuses access to its books and records where requested under the proposed contract.

8. This Anti-Bribery and Anti-Corruption Policy (ABAC) Policy constitutes a minimum standard. It must be complied with in any country in which our Company does business even when the policy is stricter than the anti-bribery laws that are applicable, including both applicable local laws and those laws with extra-territorial application. However, when applicable anti-bribery laws are stricter than this policy, such laws must be complied with. In case of any doubts, Designated Persons must contact our Company's Compliance Officer (as defined below).

9. The guidelines in this ABAC Policy should be read in conjunction with:

- The Whistle-blower Policy;
- Any guidance published pursuant to this policy;
- Any other relevant policies as may be implemented from time to time.

10. Because no code of conduct or policy can cover every possible situation, our Company relies on the Designated Persons to use good judgment and to speak up when they have either questions or concerns.

## **II. SCOPE AND APPLICABILITY**

This ABAC Policy is applicable to our Company and to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person.

Designated Persons have a special responsibility to comply with this ABAC Policy, and ensure that our Company's procedures and measures to combat ABAC risks and threats are upheld and strengthened. If in doubt whether an act would breach this ABAC Policy, the Designated Person must take a step back and ask oneself the following on a contemplated action:

- What is the intent – is it to build a relationship or is it something else?
- How would it look if these details were on the front page of a major newspaper?
- What if the situation were reversed – would there be a double standard?

Whenever faced with a doubt on the applicability of this ABAC Policy, or if an act could be perceived to be a breach of this ABAC Policy, consult the Ethics Counsellor or the Compliance Officer.

## **III. COMPLIANCE OFFICER**

The Company shall, from time to time, designate an employee of sufficient seniority, competence and independence as the compliance officer to ensure compliance with the provisions of this ABAC Policy ("Compliance Officer") and the same shall be notified to the Designated Persons. All reports, complaints, doubts or concerns in relation to this ABAC Policy shall be raised by the Designated Persons to the Compliance Officer. Every query or concern raised by any Designated Person in relation to any suspected violation of this ABAC Policy shall be investigated by the Compliance Officer.

Any action required to be undertaken under this ABAC Policy shall be taken by the Compliance Officer in accordance with this ABAC Policy. The Compliance Officer shall have a functional reporting to the Designated Director and shall submit quarterly compliance reports to the

Designated Director. Aggravated cases of breach of this ABAC Policy shall be escalated to the Board of Directors of the Company (“Board”).

#### **IV. DEFINITIONS**

##### **1. Bribery**

Bribery includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing lavish/inappropriate gifts, hospitality and entertainment, inside information, or sexual or other favors; offering employment to a relative; underwriting travel expenses; abuse of function; or other significant favors. Bribery includes advantages provided directly, as well as indirectly through an intermediary. ABAC Policy prohibits Designated Persons from giving bribes not only to any public/government official but also to any private individual. Bribery in any form will not be tolerated.

##### **2. Corruption**

Corruption includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards.

##### **3. Public Official (Government Official or Public Servant) / Foreign Public Official**

*In the Indian context, a public official would include (but not be limited to) the following:*

- any person holding a legislative, executive or administrative office of the government (domestic or foreign), or acting in the official capacity for or on behalf of a legislative, executive, or administrative office of the government (domestic or foreign), whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person’s seniority;
- any person in the service or pay of the government or of a corporation established by or under a central, provincial or state statute, or an authority or a body owned or controlled or aided by the government or a government company or is remunerated by

the government by fees or commission for the performance of any public duty;

- any judge, including any person empowered by law to discharge, whether by himself/herself or as a member of any body of persons, any adjudicatory functions;
- any person authorized by a court of justice to perform any duty, in connection with the administration of justice, including a liquidator, receiver or commissioner appointed by such court;
- any person who performs a public duty, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the country and as applied in the pertinent area of law; and
- Any other person defined as a “public official” under the domestic law.

“State” means all levels and subdivisions of governments (i.e., local, regional, or national and administrative, legislative, or executive).

### **Foreign public official**

Under non-Indian ABAC laws, what constitutes a “foreign official” or “foreign public official” is interpreted broadly and includes officials from all branches of government, as well as public international organizations, regardless of whether the official is a paid or unpaid employee. The term also includes political parties, party officials, and candidates for public office. Further it includes employees or agents of state-owned or state-controlled enterprises and means any person acting in an official capacity on behalf of any government department, agency, instrumentality, or corporation, family members of the official, as well as a political party official or any candidate for political office.

#### **4. Facilitation payment or kickbacks**

“Facilitation Payments” are unofficial payments made to public officials in order to secure or expedite the performance/ non-performance of a routine or necessary action. They are sometimes referred to as 'speed' money or 'grease' payments or good-will money. The payer of the facilitation payment usually already has a legal or other entitlement to the relevant action. “Kickbacks” are typically payments made in return for a business favor or advantage.

#### **5. Third party**

The term “third party” includes any individual or organization, who/which comes into contact with the Company or transacts with the Company, and also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the company.

#### **6. Improper performance**

Breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust amounts to improper performance. This would also include obtaining, agreeing to receive, accepting, or attempting to obtain, an undue advantage for acts to be performed properly.

### **V. WHAT IS CORRUPTION?**

1. Corruption can take place in many types of activities. It is usually designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behavior they could be in the form of money, a privilege, an object of value, an advantage, or merely a promise to influence a person in an official or public capacity. Usually, two people are involved and both would benefit. Examples of a bribe include offering or receiving of cash in the form of a kickback, loan, fee or reward, or giving of aid, donations, or voting designed to exert improper influence.

2. The areas of business where corruption, including bribery, can most often occur include:

- Gifts, Entertainment and Hospitality;
- Facilitation Payments;
- Procurement Process;
- Political, Community or Charitable Contributions;
- Improper Performance of Duties;
- Favors Regarding Recruitment Opportunities.

3. In the Indian context, the ingredients of an act of bribery under the PCA are:

- Any gratification to a public servant for doing or forbearing to do an official act or favor/ disfavor to any person.
- Any gratification to any person for inducing any public servant by corrupt/ illegal or personal influence to do/ forbear from doing an official act or to show favor/ disfavor to any person.
- Providing of any valuable thing, without adequate payment for the same, to a public servant by a person who has or is likely to have official dealings with the public servant.
- Violators of the PCA shall be subject to fines and/or imprisonment. Liability could also be attributed to a company, if an employee/agent acted within the scope of employment, to obtain benefit for such a company. The PCA and recent judgments of the Supreme Court of India have made it clear that private persons can be prosecuted under the PCA along with public servants for having abetted the offence of bribery. Improper Performance could lead to accusations of criminal breach of trust, which is an offence under the Indian Penal Code (IPC). The IPC also penalizes abetment as an offence. Under the IPC any person who intentionally aids, by any act or illegal omission, the doing of a thing, or engages with a person/persons in a conspiracy for the doing of a thing, is guilty of the offence of abetment. Additionally, a person could also be prosecuted for offenses of cheating and/or criminal breach of trust under the IPC.

## VI. GIFTS, ENTERTAINMENT AND HOSPITALITY

1. Gifts, entertainment, and hospitality may be acceptable if they are reasonable, proportionate, made in good faith and in compliance with the Company's policies. Any doubts in this regard should be clarified with the Company Ethics Counselor or the Compliance Officer.
2. What is a "Gift"? A gift is anything of value and would encompass any gratuitous monetary or non-monetary benefit. It includes tangible items such as cash, precious metals, stones, jewelry, art, and any of their equivalents, but also intangible items such as discounts, services, loans, favors, special privileges, advantages, benefits and rights that are not available to the general public.

A "gift" also includes meals, entertainment, hospitality, vacations, trips, use of vacation homes, tickets to sporting or music events, outings, vendor familiarization trips, and use of recreational facilities. Under no circumstances should any Designated Persons ever solicit a gift from any person or company that is doing, or seeks to do, business with the Company. Note that meals, entertainment and hospitality may also qualify as a gift, unless they fall within reasonable bounds of value and occurrence.

3. Designated Persons must familiarize themselves with our Company's Gifts & Hospitality Policy.
4. Offering gifts in order to win or keep business is unethical and, in many cases, illegal. If you find it difficult to provide a comfortable answer to questions on appropriateness of a gift, or if you are unsure if you should accept something of value, each Designated Person must ask the Compliance Officer. If your Compliance Officer is conflicted, seek guidance from the Designated Director.
5. Note that this ABAC Policy is applicable whether a Designated Person is personally offered a gift, or if a gift is offered for the benefit of a specific group or department at the Company (including as a prize to be distributed at a party or event). All gifts received should be promptly reported to the Compliance Officer if they are not in the ordinary course of business, in compliance with all policies issued by the Company and as per applicable law. Gifts of cash or cash equivalents must never be accepted.

6. A Designated Person may give a modest gift to a government or other public official only when it is appropriate, allowed by local law, and in accordance with our Company's Gifts and Hospitality Policy.

Designated Persons are prohibited from offering gifts or granting favors outside the ordinary course of business to current or prospective customers, their employees or agents or any person (including but not limited to Government Officials) with whom the company or its business associates have a contractual relationship, or intend to negotiate an agreement. No Designated Person should accept or solicit any personal benefit from anyone in the course of business in a manner that might compromise, or appear to compromise their objective assessment.

7. As a general guide, the giving or receiving of gifts or hospitality may be acceptable if it meets all the following requirements:

- Is bona-fide and made in the normal course of business and does not create the appearance (or an implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved terms of sale or service;
- Complies with local laws and customs (including cultural and religious festivals) and is not prohibited under applicable law;
- Would not influence, or appear to influence, or cause a conflict of interest for the gift giver or receiver;
- Does not include cash or cash equivalents, gold or other precious metals, gems or stones;
- Does not include any form of services or non-cash benefits such as promise of employment;
- Disclosure of the same does not cause embarrassment to the giver or receiver or to the company in question;
- Is fully documented and supported by original receipts and accurately recorded in the books of accounts;
- Is given openly, not secretly and in a manner that avoids the appearance of impropriety.

In addition to the above, each Designated Person is required to be in compliance with the specific guidelines set out in the Company's Gifts and Hospitality Policy, including in relation to maximum values permitted.

## **VII. FACILITATION PAYMENTS OR KICKBACKS**

1. All Facilitation Payments and kickbacks are corrupt payments, and any such payment in the course of our Company's business is strictly forbidden.
2. Facilitation Payments are often involved in obtaining non-discretionary permits, licenses or other official documents, expediting lawful customs clearances, obtaining the issuance of entry or exit visas, providing police protection, whether or not such actions are connected to the award of new business or the continuation of existing business.

## **VIII. PROCUREMENT PROCESS**

Designated Persons must follow our Company's processes and adhere to the system of internal controls around supplier selection. Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called tender), it is most important we maintain documentation supporting our internal controls. Designated Persons must familiarize themselves with our Company's procurement processes and must adhere to the same.

## **IX. INTERACTION WITH CUSTOMERS**

1. Where a Designated Person is responsible for relationships with customers, she/he may entertain customers for bona-fide purposes only in accordance with our Company's Gifts & Hospitality Policy. Records of such entertainment should be maintained as per our Gifts & Hospitality Policy.
2. Bribery may also occur on the sales side, for example an employee might accept a bribe to prefer one customer over another, again with potentially damaging consequences for relationships with other customers, as well as the legal consequences to our Company.
3. In the normal course of business, discounts and rebates are offered to customers in both the private and public sectors. While this is common industry practice, the wide variety of arrangements and the relative complexity of some of them creates a degree of risk that such arrangements could be used to disguise improper inducements to individual customer representatives (for example, selective dissemination of the fact that free products are being provided), and consequently great care needs to be exercised in the

deployment of such arrangements.

## **X. USE OF THIRD PARTY AGENTS, CONSULTANTS AND OTHER INTERMEDIARIES**

1. Our Company may be held responsible for bribes paid on its behalf by third parties, with severe and often irreparable consequences, even if our Company did not authorize these payments. Therefore, it is critical that we are careful in the selection of agents, that is, those people or companies who act on our behalf.
2. All dealings with suppliers, agents, contractors, service providers, intermediaries, consultants, and advisors, shall be carried out with the highest standards of integrity and in compliance with all relevant laws and regulations. We expect all our third parties to share our values and our ethical standards.
3. The following should be kept in mind prior to engaging a third party:
  - Appropriate due diligence is conducted and properly documented;
  - Formal commitment (in writing) is sought from the third party to ensure compliance to these standards;
4. Appropriate anti-bribery and anti-corruption provisions are incorporated in the contracts in consultation with our Company's Legal team, including the right to audit, as well as a clause on termination, if the partner/party fails to abide by the anti-bribery and anti-corruption terms.

## **XI. GOVERNMENT INTERACTION**

The Company shall comply with government procurement regulations and shall be transparent in all its dealings with government agencies.

## **XII. POLITICAL COMMUNITY AND CHARITABLE CONTRIBUTIONS**

1. Designated Persons are not allowed to make political contributions from the funds, properties or other resources of our Company except political contributions approved by the Board in compliance with applicable law. Our Company may make charitable donations for humanitarian needs and other factors, including emergency situations and disaster relief. Such contributions must be made in compliance with our Company's

policy. However, it is important that we pay special attention when making donations such that they shall be made without demand or expectation, so that our donations would not be considered inducements, as this would be a violation of the anti-corruption laws.

Thus, contributions by the Company to community projects or charities need to be made in good faith and in compliance with ABAC Policy and all other relevant policies and procedures.

2. Before making such a contribution, the Designated Persons should ensure that:
  - Such charitable contributions are not dependent on, nor made to win, a business deal.
  - The contribution is always made to the charity and not to any particular individual, except where donations or grants are provided directly to affected victims of natural disasters, pursuant to our Company's policy.
  - Contributions should be given to entities where the end use of the contribution is known and/or controlled.
  - Contributions should only be made to charitable organizations which are registered under the laws of the country.
  - As far as possible, background checks on the charitable organizations should be carried out in all cases especially to ensure that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering laws, anti- terrorism laws and other applicable laws.
  - Only such charitable contributions shall be made that are legal and ethical under local laws and practices.

### **XIII. SPONSORSHIPS**

Sponsorships are closely allied to the various types of community / business activities undertaken by our Company. These could range from sponsoring educational scholarships to local sports teams. Any sponsorship must be for genuine business or charitable objectives without any element of quid pro quo. Any such sponsorship must be transparent, duly approved, properly documented and duly reported as per our Company's CSR Policy.

#### **XIV. MERGERS AND ACQUISITIONS**

1. A company that does not perform adequate due diligence regarding compliance with anti-bribery and anti-corruption procedures of the target company prior to a merger or acquisition may face both legal and business risks. Our Company will undertake appropriate and reasonable due diligence on the reputation and integrity of any business in which it makes investments.
2. Our Company, when it is acquiring a potential target, will train new employees, re-evaluate third parties under company standards and where appropriate, conduct audits on new business units.

#### **XV. CONFLICTS OF INTEREST**

In case of conflict of interest, even if it is perceived or potential, reported to the Company Ethics Counselor or the Compliance Officer, must be in turn reported to the appropriate competent authority.

#### **XVI. BOOKS, RECORDS, AND INTERNAL CONTROL REQUIREMENTS**

1. Accurate and complete recordkeeping is essential to the successful operation of our Company, as well as to our ability to meet our legal and regulatory obligations. Each Designated Person has a responsibility to be accurate, complete and honest in what he/she reports and records to meet regulatory requirements, as well as in all internal and external documents of our Company, including accounting records, time cards, expense reports, invoices, payroll records, safety records, business records, performance evaluations, etc.
2. Expenses must never be hidden or purposefully misclassified. Many serious global bribery and corruption scenarios are found to involve inaccurate record-keeping. To prevent this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. All Designated Persons must ensure that we maintain accurate books, records and financial reporting.
3. All business units and entities must maintain an effective system of internal control and monitoring of our transactions. Certain monitoring controls are identified in our policies, specifically regarding approval of travel and entertainment expenses. It is the responsibility of the Designated Persons to be knowledgeable about control procedures and ensure compliance. Designated Persons are required to ensure that all expense

claims relating to hospitality, gifts or charitable donations are submitted in accordance with applicable policies and specifically record the reason for the expenditure.

4. Designated Persons are required to maintain all financial records and have appropriate internal controls in place which will evidence the business reason for making payments to or receiving payments from third parties.
5. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with accuracy and completeness. Our records management and retention policies ensure that we maintain the records we need to meet our legal, tax and regulatory requirements and securely dispose of records that are no longer needed or are beyond the statutory retention period. Designated Persons should take care never to dispose of information that may be relevant to current or threatened litigation or subject to a legal prohibition or stipulation until they are authorized in writing to do so by the relevant department.
6. Designated Persons who see or suspect financial misconduct should notify their supervisors immediately, and contact the Compliance Officer.

## **XVII. COMMUNICATION AND COMPLIANCE TRAINING**

1. It is our commitment to ensure that our Company has adequate procedures to combat ABAC risks and threats. To meet this objective, regular training will be made available to all business units in relation to our ABAC Policy, obligations of Designated Persons, company procedures and measures. The details of our Company's whistle blowing procedures will be disseminated throughout our Company and will be so done on a regular basis.
2. Training will be conducted either on-line or in-person or a combination of both and will be administered by the Compliance Officer. The training will be required to be completed within a specified timeframe. The Designated Persons must not treat these training programs as a "one-time" event and Designated Persons are expected to keep themselves up to date by undergoing repeat training at regular intervals or each time a

training program is updated.

3. Our Company may also extend training programs to third parties, if it is envisaged that the work profile allocated to them carries a significant risk as per this ABAC Policy.

## **XVIII. HOW TO RAISE CONCERN**

1. Every Designated Person is encouraged to raise concerns about any bribery issue or suspicion of malpractice or any case of corrupt practice or any breach of this ABAC Policy or applicable ABAC law at the earliest possible stage. If he/she is unsure whether a particular act constitutes bribery or corruption or if he/she has any other queries, these should be raised with the Compliance Officer.
2. Designated Persons may also raise concerns or queries to the Ethics Counselor through "Whistle- Blower Policy" which is intended to encourage and enable employees, and other stakeholders, to raise serious concerns internally.
3. No personnel who in good faith, reports a violation of the ABAC Policy shall suffer harassment, retaliation or adverse employment consequences.

## **XIX. RESPONSIBILITY AND PENALTIES**

1. Our Company takes the subject of corruption and bribery very seriously. Any violation of this ABAC Policy will be regarded as a serious matter and shall result in disciplinary action, including termination, consistent with applicable law and the employee's terms of employment.
2. Bribery is a criminal offense. The defaulting Designated Person will be accountable whether she/he pays a bribe herself/himself or authorizes, assists, or conspires with someone else to violate this ABAC Policy or an anti-corruption/anti-bribery law. Punishments for violating the law are against a defaulting Designated Person as an individual and may include imprisonment, probation, and significant monetary fines which will not be paid by the Company.

3. In case of violations of this ABAC policy, the Compliance Officer shall take appropriate steps such as:
- Assigning an Investigation Team: Experts with the right knowledge and objectivity may be appointed to investigate a complaint.
  - Conducting an Investigation: Every investigation relating to a suspected violation of this ABAC Policy shall be investigated by the Compliance Officer together with other members. The objective of such an investigation would be to determine the facts, through interviews with concerned participants and/or review of documents. Such investigation team will make a written demand for information, records etc. that is reasonably related to the alleged offence, including, without limitation: (a) copies or access to all records relating to the alleged offence (such as telephone records, Internet service records and/or other records stored on computer hard drives or other information storage equipment); and/or (b) a written statement made by the Designated Person, if any, setting out in detail all of the facts and circumstances of which such a Designated Person is aware with respect to the alleged offence. Each Designated Person shall co-operate with the investigation team and promptly respond to all requests for information. It is clarified that the report prepared by the investigations team, shall be kept confidential and shall be shared only with such persons who have a “need to know” under applicable law or Company Policies, e.g. a copy of the report may be shared with the Designated Director.
  - Corrective Action: If necessary, corrective actions shall be prescribed or suggested to appropriate managers, officers and employees for implementation.
  - Penalties: The Compliance Officer shall, after considering inputs, if any, from the Company Ethics Counselor and the Designated Director have the discretion to recommend appropriate disciplinary action, including suspension and termination of service of such a defaulting Designated Person. The Compliance Officer shall also recommend if the violation is potentially criminal in nature and should be notified to the authorities. In the event of criminal or regulatory proceedings, the Designated Persons shall co-operate with relevant authorities. Depending on the nature and scale of default by the defaulting Designated Person, the Compliance Officer may also recommend to the Board to commence civil and/or criminal proceedings against such a Designated Person in order to enforce remedies available to our Company under applicable laws.

4. All internal investigations shall follow principles of natural justice and shall ensure that the relevant Designated Person is provided with an opportunity to make his/her case before the investigation team.

## **XX. PERIODIC REVIEW AND EVALUATION**

Our Company's Audit Committee will monitor the effectiveness and review the implementation of this ABAC Policy, considering its suitability, adequacy and effectiveness. Our Company reserves the right to vary and/or amend the terms of this ABAC Policy from time to time.

## **WHISTLE BLOWER POLICY**

Hanumant Kripa Easy Finance Private Limited is committed to maintaining highest standards of ethics, honesty and integrity in all its acts and deeds which are relied upon by its investors, lenders, shareholders and other stakeholders.

The Company has laid down a set of code of conduct for all its employees and believes that it is important to prevent corruption, misuse of office property/powers, frauds, acts resulting in Financial Loss / Operational Risk, Loss of reputation, and any other such activity which is detrimental to its stakeholders' interests.

Employees of the Company, customers, and/or third-party intermediaries such as vendors and consultants may use the procedures set out in this Whistle blower Policy to submit confidential and/or anonymous Protected Disclosures. This Policy allows for disclosure by employees, customers and/or third-party intermediaries of such matters internally, without fear of reprisal, discrimination or adverse employment consequences, and also permits the Company to address such disclosures or Protected Disclosures by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible. The Company will not tolerate any retaliation against any employee, customer and/or third party intermediary for reporting in good faith, any inquiry or concern.

## **PURPOSE**

The purpose of this policy is to provide a framework to promote responsible and secure whistle blowing. It protects employees, customers and/or third-party intermediaries wishing to raise a concern about serious irregularities within the Company. The Policy neither releases

employees, customers and/or third-party intermediaries from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

The Company does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing. This Policy ensures that Personnel are empowered to pro-actively bring to light such instances, without fear of reprisal, discrimination or adverse employment consequences.

The Whistleblower's role is that of a reporting party. Whistleblowers are not investigators or finders of facts; neither can they determine the appropriate corrective or remedial action that may be warranted.

## DEFINITIONS

**“Alleged wrongful conduct”** shall mean violation of law, Infringement of Company's rules, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority”

**“Audit Committee”** means a Committee constituted by the Board of Directors of the Company in accordance with guidelines of Companies Act, 2013.

**“Board”** means the Board of Directors of the Company.

**“Code”** means Code of Conduct for Directors and Senior Management Executives adopted by Hanumant Kripa Easy Finance Private Limited.

**“Employee”** means all the present employees and Directors of the Company.

**“Personnel”** means any employee (including interns), director, officer, customer, contractor and/or third-party intermediary, engaged to conduct business on behalf of the Company, such as vendors and consultants.

**“Protected Disclosure”** means a concern raised by an employee or group of employees of the Company, through a written communication and made in good faith which discloses or demonstrates information about an unethical or improper activity under the title “SCOPE OF THE POLICY” with respect to the Company. It should be factual and not speculative or in the nature of an interpretation / conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.

**“Questionable Accounting or Auditing Matters”** include, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or non-compliance with the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company's financial condition.

**"Reportable Matters"** means Questionable Accounting or Auditing Matters (defined below), and/or any other Company matters involving abuse of authority, breach of Code of Conduct, fraud, bribery, corruption, employee misconduct, illegality, health and safety, environmental issues, wastage/misappropriation of company funds/assets and any other unethical conduct.

**"Subject"** means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

**"Vigilance and Ethics Officer"** means an officer appointed to receive protected disclosures from whistle blowers, maintaining records thereof, placing the same before the Audit Committee for its disposal and informing the Whistle Blower the result thereof.

**"Whistleblower"** is defined as any Personnel (defined below) who has or had access to data, events or information about an actual, suspected or anticipated Reportable Matter, within or by the organization, and, whether anonymously or not, makes or attempts to make a deliberate, voluntary and protected disclosure or Protected Disclosure of organizational malpractice. Whistle blower is called as complainant in this policy.

**"Sexual Harassment"** is defined as 'any unwelcome sexually determined conduct, whether physical, verbal or non-verbal including but not limited to, sexual advances, demands or requests for sexual favors, molestation, sexually nuanced gestures, comments, remarks or jokes, either verbal, textual, graphic or electronic.' The broad guidelines of the Government Bill on Sexual Harassment of Women at the Workplace and guidelines as laid down under the international Convention for Elimination of all forms of Discrimination Against Women will be followed in the event of any Protected Disclosure under this category.

## GUIDING PRINCIPLES:

To ensure that this Policy is adhered to, and to assure that the concern will be acted upon seriously, the Company will:

- Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so;
- Treat the victimization as a serious matter including taking necessary disciplinary action against such person
- Ensure complete confidentiality
- Not attempt to conceal evidence of the protected disclosure
- Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made
- Provide an opportunity of being heard to the persons involved especially to the Subject

## SCOPE

***The Policy covers the following - the list is indicative and not exhaustive:***

- Fraud, corruption or theft committed / avenues for such offences
- Questionable accounting or auditing matters, internal controls, disclosure matters
- Intentional concealment and/or fraudulent reporting of financial or other information to investors, shareholders, regulatory authorities and other stakeholders
- Process deviations
- Misuse of company property and/or funds
- Employee misconduct
- Environmental, health and safety issues that could endanger employees/public
- Failure to comply with the law and/or the Company's set rules and regulations, including the Code of Conduct of the Company

***The following concerns are not covered by the Policy:***

- frivolous and bogus Protected Disclosures;
- business and financial decisions taken by the Company that do not involve wrongdoing or illegality;
- any matter already addressed pursuant to disciplinary or other procedures of the Company;

- career related or other personal grievances.

## WHISTLE BLOWER ENQUIRY TEAM

Audit Committee shall operate the Vigil Mechanism.

The Audit Committee of the Company will appoint a Whistle Blower Enquiry Team (WBET) to receive and act on all the reports/ Protected Disclosures made under this policy. WBET will comprise of two members This team will be responsible for receiving all protected disclosure under this policy, maintaining confidentiality and ensuring appropriate action.

WBET is empowered to appoint an enquiry committee (as may be required) to conduct investigation and enquiries as part of their fact finding process. The members of this Committee should exhibit fairness, objectivity, thoroughness, ethical behavior and observe high standards of professionalism. Depending on the nature of Protected Disclosure/report, WBET can also appoint independent investigators at its discretion for the purpose of fact finding.

Any member of the Audit Committee or other officer having any conflict of interest with the matter shall disclose his/her concern /interest forthwith and shall not deal with the matter.

## REPORTING MECHANISM

Personnel should raise Reportable Matters with someone who is in a position to address them appropriately. In most cases, a Personnel's supervisor or manager is in the best position to address an area of concern. Supervisors or managers to whom Reportable Matters are raised are required to report the same immediately, to the WBET When there is a protected disclosure against the WBET then it should be addressed directly to the Chairman or Managing Director or CEO of the company. If protected disclosure is against the Chairman or Managing Director or CEO of the company should be addressed to Chairman of the Audit Committee.

Notwithstanding the aforesaid, Personnel can lodge a protected disclosure in one of the following ways:

- by contacting any member of the WBET or anyone in management, whom the Whistleblower is comfortable approaching. The WBET members' names and contact information will be shared with employees and stakeholders (on request) and also posted on the Company's Shared Drive under the HR folder;
- by contacting the Director Sumit Goel – by email: [sumit@hkef.in](mailto:sumit@hkef.in)
- by sending an email to [sumit@hkef.in](mailto:sumit@hkef.in) ; or by sending a Protected Disclosure letter in a sealed envelope marked “Protected disclosure under Whistle Blower policy” to the

WBET If the complaint is not super scribed and closed as mentioned above, it will not be possible for the Audit Committee to protect the complainant and the protected disclosure will be dealt with as if a normal disclosure

A Protected Disclosure may be made anonymously. If a Protected Disclosure is made anonymously, however, the complainant must be detailed in their description of the Protected Disclosure and must provide the basis of making the assertion therein.

## **PROTECTED DISCLOSURES**

Although a Whistleblower is not required to furnish any more information than what he/she wishes to disclose, it is essential for the Company to have all critical information in order to enable the Company to effectively evaluate and investigate the Protected Disclosure. It is difficult for the Company to proceed with an investigation on a Protected Disclosure, particularly an anonymous Protected Disclosure, which does not contain all the critical information such as the specific charge. The Protected Disclosure or disclosure must therefore provide as much detail and be as specific as possible, including names and dates, in order to facilitate the investigation.

To the extent possible, the Protected Disclosure or disclosure must include the following:

1. The employee, and/or outside party or parties involved;
2. When did it happen: a date or a period of time;
3. Type of concern (what happened);
  - Financial reporting;
  - Legal matter;
  - Management action;
  - Employee misconduct; and/or
  - Health and safety and environmental issues.
4. Submit proof or identify where proof can be found, if possible;
5. Who to contact for more information, if possible/ other witnesses; and/or
6. Prior efforts to address the problem, if any.

## INVESTIGATION

In order to protect the identity of the Whistleblower WBET will not issue any written acknowledgement of receipt of the Protected Disclosure. Subject to verification of facts, WBET will take the necessary action and if required, ask for more information from the

Whistleblower (if details are available).

WBET will initiate the following steps –

1. In cases of anonymous Protected Disclosures, the team shall make discreet inquiries to ascertain if there is any basis for proceeding further with the Protected Disclosure
2. Either as a result of the discreet enquiry, or on the basis of Protected Disclosure itself without any inquiry, if the team is of the opinion that the matter requires to be investigated further, WBET will initiate appropriate action. In cases, where the initial enquiries indicate that the concern has no basis, or it is not to be pursued under this policy, then the decision is documented.
3. The decision to conduct further investigation will be taken only if –
  - a. The concern constitutes an unethical activity (based on the initial enquiry)
  - b. The concern comes under the purview of the policy.

The decision to conduct further investigation is not an accusation and the entire enquiry must be treated as fact-finding process. The outcome of the investigation may not conclude an improper or unethical act.

4. All information disclosed during the course of the investigation will remain confidential, except as necessary or appropriate to conduct the investigation and take any remedial action, in accordance with any applicable laws and regulations. The Company reserves the right to refer any concerns or Protected Disclosures regarding Reportable Matters to appropriate external regulatory authorities. All Personnel have a duty to cooperate in the investigation of Protected Disclosures reported as mentioned hereinabove. Depending on the nature of the Protected Disclosure, any concerned Personnel, at the outset of formal investigations, may be informed of the allegations against him/her and be provided an opportunity to reply to such allegations.

5. All investigations shall normally be completed within 90 days from the date of receipt of the Protected Disclosure and action documented within 10 days thereafter.

## **RETALIATION**

No Personnel who, in good faith, makes a disclosure or lodges a Protected Disclosure in accordance with this Policy shall suffer reprisal, discrimination or adverse employment consequences. The Company strictly prohibits discrimination, retaliation or harassment of any kind, against a Whistleblower who, based on his/her reasonable belief that one or more Reportable Matters has occurred or are occurring, reports that information.

If any Personnel who makes a disclosure or Protected Disclosure in good faith, believes that he/she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he/she must immediately report those facts to his/her supervisor or manager. If, for any reason, he/she does not feel comfortable discussing the matter with these persons, he/she should bring the matter to the attention of the WBET.

## **FALSE ALLEGATION & LEGITIMATE EMPLOYMENT ACTION**

An employee / vendor who knowingly make false allegations of unethical & improper practices or alleged wrongful conduct shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further, this policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independent of any disclosure of information by him and for legitimate reasons or cause under Company rules and policies.

## **DECISION & REPORTING**

If an investigation leads the WBET / Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the WBET / Chairman of the Audit Committee shall recommend to the Board of Directors of the Company to take such disciplinary or corrective action as he may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures and remedial action will commensurate with severity of the offence.

The Company may also take reasonable and necessary measures to prevent any further violations, which may have resulted in a Protected Disclosure being made. In some situations, the Company may be under a legal obligation to refer matters to appropriate external regulatory authorities.

In case the Subject is the Chairman/MD/CEO of the Company, the Chairman of the Audit Committee after examining the Protected Disclosure shall forward the protected disclosure to

other members of the Audit Committee if deemed fit. The Audit Committee shall appropriately and expeditiously investigate the Protected Disclosure

If the report of investigation is not to the satisfaction of the complainant, the complainant has the right to report the event to the appropriate legal or investigating agency

## **DOCUMENT RETENTION**

The Company shall maintain documentation of all Protected Disclosures or reports, subject to this Policy. The documentation shall include any written submissions provided by the complainant, any other Company documents identified in the Protected Disclosure or by the Company as relevant to the Protected Disclosure, a summary of the date and manner in which the Protected Disclosure was received by the Company and any response by the Company to the complainant. All such documentation shall be retained by the Company for a minimum of seven (7) years from the date of receipt of the Protected Disclosure. Confidentiality will be maintained to the extent reasonably practicable depending on the requirements and nature of the investigation, as indicated above.

A consolidated quarterly report on the Protected Disclosures received along with the details on findings and action taken must be presented to the Audit Committee and Board of the company.

## **SECRECY / CONFIDENTIALITY**

The complainant, WBET, Members of Audit Committee, the Subject and everybody involved in the process shall:

- Maintain confidentiality of all matters under this Policy
- Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.
- Not keep the papers unattended anywhere at any time
- Keep the electronic mails / files under password.

## **COMMUNICATION**

The existence of this policy will be communicated to all stakeholders and a copy of this policy can be obtained from the Company on demand and will be pasted in notice board of the company. Soft copy of this policy will be made available on the Company's website and any amendments to the policy will be notified via email.

## INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the amended Companies Act, 2013 and/or RBI or SEBI Regulations and/or any other statutory Regulation(s) as amended from time to time.

## ADMINISTRATION AND REVIEW OF THE POLICY

The Board of Directors shall be responsible for the administration, interpretation, application and review of this policy. The Board also shall be empowered to bring about necessary changes to this Policy, if required at any stage with the concurrence of the Audit Committee.

## AMENDMENT

The Company may modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with regulations and/or accommodate organizational changes within the Company. However, no such amendment or modification will be binding on the Employees and directors unless the same is notified to them in writing or communicated via E Mail.

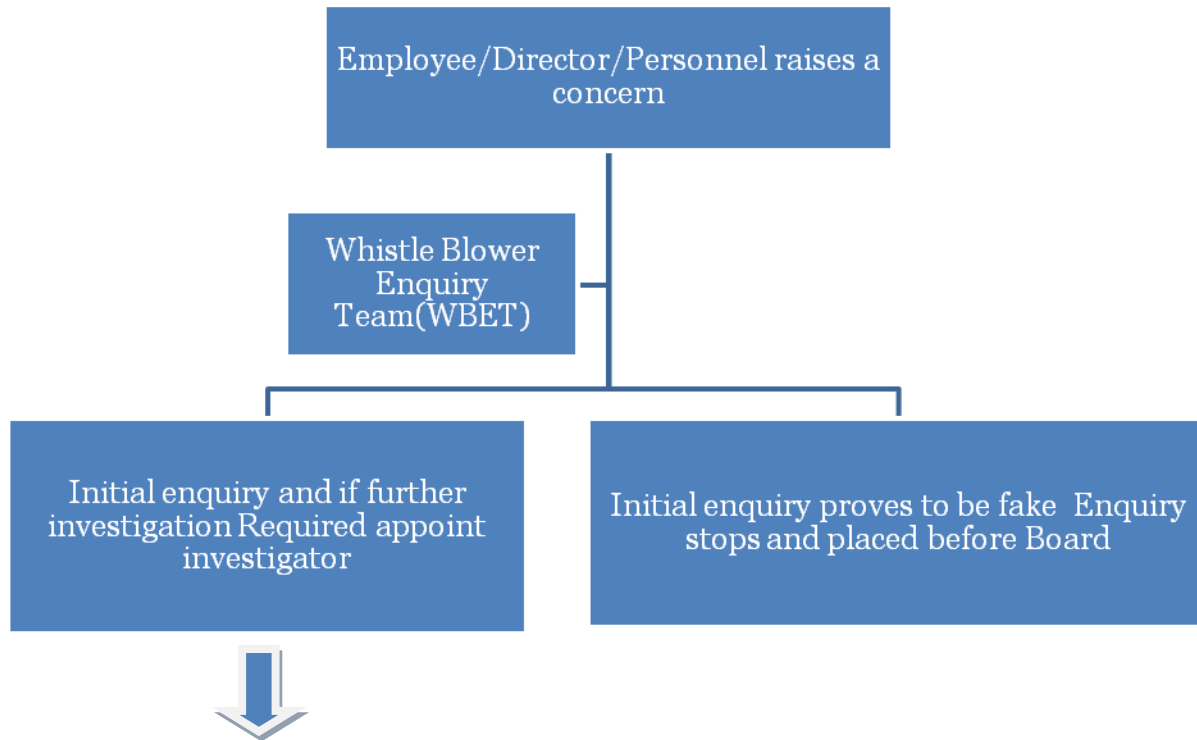
## FORMAT FOR WHISTLE BLOWING

<b>Date</b>	
<b>Name of the Employee/Director</b>	
<b>E- mail id of the employee/Director</b>	
<b>Communication Address</b>	
<b>Contact No</b>	
<b>Subject matter which is reported</b>	
<b>(Name of the person/ event focused at)</b>	
<b>Brief about the concern</b>	
<b>Evidence (enclose, if any)</b>	

### Signature

**Note: The whistle blowing shall be submitted at least within 30 days of the occurrence of the concern/event.**

## PROCESS FLOW OF WHISTLE BLOWER



- Disciplinary action and preventive measures if the concern is disproved if the protected disclosure is proved.
- Action includes dismissal or referring to The subject is exonerated external agency or regulator.

## PURCHASE POLICY

The purpose of this policy is to implement a process that involves full documentation and transparency among vendors and vendors that supply products and services that conserve natural resources, are energy efficient and protect the environment.

As a consequence of adhering to this policy company will:

- obtain the best value for its purchases, in terms of both cost and quality;
- have a fast and efficient purchasing process;
- demonstrate financial probity and accountability to its clients, stakeholders and the public interest;
- successfully manage and prevent the potential for conflicts of interest;
- utilize a transparent and competitive contracting process where appropriate and practical;
- monitor and evaluate performance in purchasing and procurement;
- be protected from complaints and legal actions mounted by potential suppliers who believe they have not received fair treatment.

## RESPONSIBILITY

Company will be responsible for determining whether a purchase is allowable and will ensure purchases are in accordance with this policy.

## CODE OF CONDUCT

The following Code of Conduct shall govern the performance, behavior and actions of the company including Board members, directors, employees, volunteers, or agents who are engaged in any aspect of procurement, including, but not limited to – purchasing of goods and services, awarding contracts and grants; or the administration and supervision of grants.

### **Ethical Guidelines**

- The best value for goods and services must be sought.
- There will be a documented process for all purchases that will allow for transparency of decisions and review of purchases.
- Staff will ensure that they are not, or are not perceived to be in a conflict of interest with any supplier. Those staff who have, or may be perceived to have, a vested interest in the

outcome of a purchase should disclose any conflict to their supervisor and discuss whether they should exclude themselves from any role in the purchase.

- Staff will be suitably skilled and qualified to attend to the completion of their purchasing and contracting role(s).

### **Procurement Standards**

- All purchases must be necessary to fulfill the goals of the company.
- Where appropriate, consider lease and purchase alternatives to determine which is most economical and practical.
- Company will clearly document the vendor selection process in order to provide an objective justification for each purchasing decision. This includes price analysis, and final selection.
- On the purchase of \_\_\_\_\_ [Name of item] of Rs. \_\_\_\_\_ [Limit], accounts dept. on their own discretion can purchase after obtaining at least three quotations from various vendors. In case of exceeding the limit accounts dept. will be required to obtain permission from the Board. However each payment has to be authorized by the concerned authority.

## PREVENTION OF SEXUAL HARASSMENT POLICY

Hanumant Kripa Easy Finance Private Limited is committed to create and maintain a secure work environment where its Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Hanumant Kripa Easy Finance Private Limited strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in ***The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*** and Rules framed thereunder being the "The Sexual Harassment of Women at Workplace" (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Hanumant Kripa Easy Finance Private Limited, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at Hanumant Kripa Easy Finance Private Limited are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Hanumant Kripa Easy Finance Private Limited will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

## 1. SCOPE:

This policy applies to all categories of employees of the Company including permanent management and workmen, temporaries, trainees and employees on contract at its workplace. The Company will not tolerate sexual harassment.

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

## 2. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

### ***Sexual Harassment at the workplace includes following:***

1. Unwelcome sexual advances (verbal, written or physical);
2. Demand or request for sexual favors;
3. Any other type of sexually-oriented conduct;
4. Verbal abuse or 'joking' that is sex-oriented;
5. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

### 3. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### 4. COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

### 5. COMPLAINTS COMMITTEE:

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

Initially, and till further notice, the Complaints Committee will comprise of the following three members:

1. Name -Chairperson
2. Name - Member
3. Name -Member

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.

## **6. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:**

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

### **A. Informal Resolution Options**

- When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, victim can bring their concern to the attention of the Complaints Committee for redressal of grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### **B. Complaints:**

- Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the 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, 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 Chairperson to contact her and take the matter forward.
- The Chairperson of the 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 receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, chairperson will record this finding with reasons and communicate the same to the complainant.

- If the Chairperson of the Complaint Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- Where such 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.
- The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Whole Time Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The whole time director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

***Corrective action may include any of the following:***

- Warning
- Written apology from offender,
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

## **7. 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. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

## **8. ACCESS TO REPORTS AND DOCUMENTS:**

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.

## **9. PROTECTION TO COMPLAINANT / VICTIM:**

The Company is committed to ensure that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

## **10. CONCLUSION:**

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.

## **11. SCOPE:**

This policy applies to all categories of employees of the Company including permanent management and workmen, temporaries, trainees and employees on contract at its workplace. The Company will not tolerate sexual harassment.

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

## **12. DEFINITION OF SEXUAL HARASSMENT:**

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

### ***Sexual Harassment at the workplace includes following:***

1. Unwelcome sexual advances (verbal, written or physical);
2. Demand or request for sexual favors;
3. Any other type of sexually-oriented conduct;
4. Verbal abuse or 'joking' that is sex-oriented;
5. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

## **13. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### **14. COMPLAINT MECHANISM:**

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

#### **15. COMPLAINTS COMMITTEE:**

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

Initially, and till further notice, the Complaints Committee will comprise of the following three members:

4. Name -Chairperson
5. Name - Member
6. Name -Member

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.

#### **16. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:**

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

##### **C. Informal Resolution Options**

- When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, victim can bring their concern to the attention of the Complaints

Committee for redressal of grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

#### **D. Complaints:**

- Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the 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, 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 Chairperson to contact her and take the matter forward.
- The Chairperson of the 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 receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, chairperson will record this finding with reasons and communicate the same to the complainant.
- If the Chairperson of the Complaint Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- Where such 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.
- The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Whole Time Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The whole time director will ensure corrective action on the recommendations of the Complaints Committee and keep the

complainant informed of the same.

***Corrective action may include any of the following:***

- Warning
- Written apology from offender,
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

#### **17. 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. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

#### **18. ACCESS TO REPORTS AND DOCUMENTS:**

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.

## 19. PROTECTION TO COMPLAINANT / VICTIM:

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

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

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

## 20. CONCLUSION:

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.

## OFFICE POLICY

The following policies are designed to provide working guidelines for all of us.

### ***Here are the following advantages of office policies:***

- To prevent misunderstanding and lack of communication;
- To eliminate hasty, unrefined decisions in personnel matters; and
- To assure uniformity and fairness throughout the practice.

It is open to change. Changes happen as a result of internal growth, legal requirements, competitive forces or general economic conditions that affect our profession. To meet these challenges, the practice reserves the rights, with or without notice, to change, add to or delete any of the policies, terms, conditions and language presented in this manual. Changes in personnel policies are made after considering the mutual advantages and responsibilities of both employer and employee. Remember that your suggestions are welcome. Just notify the office manager whenever problems are encountered, and wherever you think improvements can be made.

## DISTRIBUTION OF POLICY

All employees will be given a copy of policies.

## **HARASSMENT**

The policy is committed to provide a work environment free of discrimination. This policy prohibits harassment in any form, including verbal, physical and sexual harassment. Any employee who believes that he or she has been harassed by a co-worker, manager or agent of the practice is to immediately report any such incident to the office manager or next higher authority. We will investigate and take appropriate action.

## **ORIENTATION AND TRAINING**

An Orientation and Training Program is conducted for all new employees. We'll introduce you to our office policies and help you adjust to our practice. If at any time you have a question, feel free to ask. During the initial Orientation and Training Period, you have the opportunity to demonstrate your attitudes and abilities and decide if your philosophy and goals are compatible with those of the practice. Upon satisfactory completion of the Orientation and Training Period, you are:

- considered potentially qualified,
- reclassified as a regular or temporary employee,
- Enrolled in the office benefit plan (if applicable).

## **NEW EMPLOYEE PERFORMANCE REVIEW**

New employees will receive one written evaluation of their job performance during the first 90 days of employment. This gives us a chance to determine where improvement or assistance and training is needed.

## **PROBLEMS AND CONCERNS: RESOLUTION PROCEDURE**

Our practice endeavors to satisfy concerns and resolve problems, whatever they may be. They could be working conditions, policies, alleged discrimination or anything else that threatens a productive work environment. Our resolution procedure works like this:

The employee brings the problem to the office manager (or immediate supervisor) within 10 days of the occurrence. The office manager will attempt to mitigate the situation.

If the employee is not satisfied, the employee takes the problem in writing within the ensuing five days to the employer, who will investigate the circumstances and subsequently return a decision to the employee within five more days.

The employer's decision on a given issue is not intended to set precedent nor bind future decisions, unless so stated as office policy.

## **KEEPING TRACK OF YOUR TIME**

All staff members are responsible, individually, for recording their time on the attendance sheet and/or card when:

- reporting for work,
- Leaving at the end of the day.

An attendance sheet and/or card is a legal document and must not be destroyed, defaced or removed from the premises. Never allow another employee to enter your time for you. Likewise, do not register another staff member's time even if asked to do so. Overtime must be authorized in advance or as soon thereafter as possible. Overtime, changes or omissions on the attendance card must be authorized and initialed.

When you leave the premises, let us know. If you have to go out of the office or the building on personal business during your scheduled hours, first, get permission. Then, check in and out on your attendance record.

## **LUNCH BREAK**

Each staff member gets an unpaid lunch break in the middle of the work day.

## **SICK LEAVE**

Sick leave is intended to protect staff against undue financial loss in the event of an illness of one or a few days' duration. Sick leave may not be used for absences other than a personal illness. Personal emergencies may qualify for sick leave if approved by management.

Upon completion of the Orientation and Training Period, regular full-time and specified regular part--time staff members earn time off for sick leave for each month worked.

To be eligible for sick leave benefits, you must contact the office the day before or no later than one hour prior to the scheduled work shift if you are unable to report to work. Failure to give advance notice may void the claim for benefits. During absence because of sickness, keep in touch with the office and let us know your progress on a daily basis.

## TERMINATION OF EMPLOYMENT

Staff members who quit, are discharged or fail to respond to a recall, will be regarded as separated from employment with the office and will maintain no seniority, recall or other rights.

Separations are either voluntary or involuntary. “Mutual agreement” separations will be classified as either voluntary or involuntary so that they may be processed in accordance with the separation policies and procedures that follow:

### **Voluntary:**

A resignation initiated by the employee.

We realize that occasionally a staff member resigns to pursue other interests. It is an accepted business practice and a common courtesy to give notice, so a replacement can be found quickly to fill the position. Although a staff member may give notice, the resigning staff member may be asked to leave immediately because of staff morale, unsatisfactory job performance or operating needs.

Staff members who are asked to leave immediately will be paid their regular salary in lieu of work. Severance pay will not be awarded, and the resignation will be treated as voluntary.

### **Unauthorized Leave:**

If a staff member requests time off that is denied, and the staff member takes off anyway, the time off will be considered job abandonment and treated as a voluntary termination.

### **Involuntary:**

A permanent separation initiated by the employer due to:

- lack of work,
- inability to perform satisfactorily the duties of the position,
- reorganization or relocation,
- unprofessional conduct, and/or
- Job abandonment.

## PERSONAL APPEARANCE AND DRESS CODE

A professional-looking staff promotes unity and teamwork at the most basic level.

## VACATION

Vacation policy clarifies who gets what days off and when. A list of holidays on which the office will be closed is a handy resource that staff can reference.

## APPRAISAL POLICY

Hanumant Kripa Easy Finance Private Limited has established a procedure for evaluating job performance on a regular basis. These performance evaluations are vital for future planning, and they provide fair, timely and objective measurement of performance in light of job requirements. Hanumant Kripa Easy Finance Private Limited is committed to support every employee to reach their potential and achieve their personal goals, which in turn will assist the organization to achieve its objectives.

The performance appraisal is designed to:

- maintain and improve job satisfaction by letting staff members know that we are interested in their job progress and personal development;
- serve as a systematic guide to recognize needs for further training and progress planning;
- assure a factual, objective analysis of an employee's performance vs. job requirements;
- help place employees in positions within the practice that best utilize their talents and capabilities;
- provide an opportunity to discuss job problems or other job-related interests;
- serve as an aid in salary administration;
- provide a basis for coordinating goals and objectives – the employee's and the practice's; and
- Give recognition for superior performance.

The performance appraisal will address job factors and behaviors that are observable, measurable and specifically related to job performance.

Following factors are considered:

- quality of work,
- quantity of work,
- job knowledge,
- employee relations, and

Salary adjustments are not necessarily made at the time of the performance evaluation.

The performance appraisal policy supports the performance appraisal scheme. The scheme is a formal process centered on an annual meeting of each employee and their line manager to discuss his/her work. The purpose of the meeting is to review the previous year's achievements and to set objectives for the following year. These should align individual employees' goals and objectives with organizational goals and objectives.

## **CORE PRINCIPLES OF THE APPRAISAL POLICY**

- The appraisal process aims to improve the effectiveness of the organization by contributing to achieving a well-motivated and competent workforce.
- Appraisal is an ongoing process with an annual formal meeting to review progress.
- The appraisal discussion is a two way communication exercise to ensure that both the needs of the individual, and of the organization are being met, and will be met in the next year.
- The appraisal discussion will review the previous year's achievement, and will set an agreed Personal Development Plan for the coming year for each member of staff.
- All directly employed employees who have completed their probationary period are required to participate in the appraisal process.
- The appraisal process will be used to identify the individual's development needs and support the objectives of the Training and Development Policy.
- The appraisal process will provide management with valuable data to assist succession planning.
- The appraisal process will be a fair and equitable process in line with our Equality Policy.

## **PERFORMANCE APPRAISAL IMPLEMENTATION**

Performance appraisal discussions will be held on an annual basis. They will be arranged by the appraisee's line manager. Line managers are encouraged to provide the opportunity for an additional 6 month verbal appraisal review, and other informal reviews as necessary throughout the year.

The discussion will be held in private. Information shared during the appraisal will be shared only with senior management. Confidentiality of appraisal will be respected. The appraiser (usually the employee's line manager) will be expected to have successfully completed appraiser training, and to be familiar with the appraisee's work.

All appraisal documents should be issued to both parties prior to the discussion, in order to allow time for both parties to reflect and prepare. These will provide a framework and focus for the discussion. A time and venue for the discussion will be advised at least one week before the meeting takes place.

## **THE APPRAISAL DISCUSSION**

The appraisal discussion will allow an opportunity for both the appraisee and the appraiser to reflect and comment on the previous year's achievements. It will praise achievement and encourage the appraisee in his/her role.

The appraiser is accountable for giving the employee constructive, timely and honest appraisals of their performance, which should take into account both the goals of the organisation and of the individual.

The discussion should be a positive dialogue, and will focus on assisting the appraisee to acquire the relevant knowledge, skills and competencies to perform his/her current role to the best of his/her abilities.

The appropriate forms will be completed and signed by both the parties. The appraisee will be given the opportunity to note any comments that he/she does not agree with and complete a self-assessment. The appraisee and line manager should agree on a Personal Development plan for the appraisee for the following year.

This will reflect the appraisee's aspirations and the organization's requirements, and should align personal and organizational goals. The organization and the line manager will support the individual to achieve these goals during the forthcoming year.

Any training needs, future training requirements, planned qualifications, development opportunities and career planning should be discussed in the light of the Personal Development Plan.

## **TRAINING AND MONITORING**

Senior Management is responsible for the appraisal process, and he/she shall ensure that appraisers and appraisees are adequately equipped and trained to undertake the performance appraisal.

## PERFORMANCE EVALUATION POLICY

Hanumant Kripa Easy Finance Private Limited annual performance review process has been designed to provide a vital link between the organization's Business Plan, its vision and guiding principles, and individual staff members. It is also designed to ensure that goals and objectives flow from the top of the organization to the personal objectives of each individual. It is integral to fostering an engaged and productive workforce, recognizing and rewarding good performance, and managing underperformance.

## PURPOSE

The purpose of this policy is to ensure that a consistent approach is followed for conducting Annual Performance Reviews, and that job-related skill and knowledge, and employee competencies and behaviors, are evaluated and compared against set standards and business objectives.

## POLICY

During the first month of an employee's commencement in a role, Managers will work with the employee to develop a Performance Plan which will be updated during the Financial Year Period. The Performance Plan will outline the employee's goals and objectives for a 12-month period in line with the organization's Business Plan.

Similarly, a Development Plan will outline the individual's development priorities for the following 12-month period, as well as reviewing any for the previous 12 months. Consideration should also be given to the individual's long-term career objectives.

Managers will conduct a formal Annual Performance Review with each employee for specified period. Progress reviews may be conducted on an informal basis more frequently throughout the financial year.

Periodic assessment and discussion of performance will be carried out throughout the course of the review period between Managers and each of their employees on an "as needed" basis.

## RESPONSIBILITIES

***It is the responsibility of the Chief Executive Officer (CEO) to ensure that managers and supervisors:***

- a. Familiarize themselves with the performance management system objectives and procedures;
- b. Carry out their responsibilities according to this policy.

***It is the responsibility of Employees to:***

- a. Participate openly and honestly in planning and assessing their own performance objectives and receiving feedback from their Manager or Supervisor.

***It is the responsibility of the Human Resources Department to:***

- a. Continually review and refine the performance management system to ensure it will support the achievement of the organization's objectives, and which will fairly and consistently evaluate each individual's performance against these objectives;
- b. provide ongoing development of Managers' skills that are required to effectively conduct performance reviews;
- c. Ensure that all Managers are aware of their responsibilities in the performance management process;
- d. Provide ongoing support and guidance to Managers with performance management issues.

***It is the responsibility of Managers to:***

- a. Set reasonable performance goals, standards and deadlines with employees;
- b. Consider reviewing an employee's role and changing it if workflow is becoming unmanageable;
- c. Inform employees about unsatisfactory work performance in an honest, fair and constructive way that allows for mutual discourse;
- d. Be objective and confidential when discussing sensitive issues.
- e. Ensure employees' position descriptions are up-to-date and reflect their current roles;
- f. Seek regular feedback from employees about their health and wellbeing;
- g. Provide employees with the resources, information and training they need to carry out their work safely and effectively.

**PERFORMANCE MANAGEMENT AND PERFORMANCE PLAN**

The Performance Plan is designed to provide the opportunity to establish targets (Indicators of Effectiveness) which provide a challenge to employees and which can be reviewed and modified in response to employee achievements.

The Manager concerned should develop a Performance Plan in conjunction with the employee within the first month of an employee commencing or during the Annual Review process. The Performance Plan is to be updated during every Annual Performance Review or as required throughout the course of the financial or performance year.

Employees should initially draft their own Performance Plan and then arrange a discussion with their Manager so that the Plan can be agreed and finalized. If a situation occurs in which the employee and Manager are unable to come to an agreement, both the employee and the Manager should attach a memo outlining their position, and forward the Performance Plan to the next-in-line Manager for a final decision.

The Performance Plan should outline goals and objectives. It is each Manager's responsibility to ensure that these are in line with the business plan. Each objective should have targets and measures documented, to allow accurate assessment.

The Performance Plan will also include an agreement of what competencies are to be demonstrated in the role.

## **ANNUAL REVIEW**

Each year of the new financial or performance year, Managers must complete an Annual Performance Review interview with their employees.

- a. The Manager must review the employee's performance against his or her agreed performance objectives, targets and measures, as well as performance against the agreed competency levels.
- b. The individual's agreed performance objectives and competencies should be reviewed against the set performance ratings.
- c. To ensure a degree of objectivity is apparent throughout the review process, the "next-in-line" Manager will continue to be involved in the review process and must agree with the review and sign it off.

