



CREDITACCESS GRAMEEN LIMITED

Non-Discrimination and Anti-Harassment Policy for Employees

Revision History

| Version | Author | Description of Changes | Release Date |
|----------------|---------------------------------------|-------------------------------|---------------------|
| 1 | Marina Alex – DGM, Human Resources | First version | March 23, 2022 |

| Version | Author | Reviewed by | Approved by |
|----------------|---------------------------------------|--------------------|--------------------|
| 1 | Marina Alex – DGM, Human Resources | MD & CEO | Board of Directors |

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Introduction:

CreditAccess Grameen Limited ("CA Grameen") strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Through the enforcement of this policy and by educating employees, CA Grameen will seek to prevent, correct, and discipline behaviours that violates this policy.

The Policy guarantees:

- Zero-tolerance approach is adopted against discrimination and harassment covering all employees, regardless of their positions. All employees are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Any reported allegation will be taken seriously and handled in a confidential manner, followed by an appropriate disciplinary action against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.
- Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

Scope of the policy:

This covers all the employees of CA Grameen.

Dissemination and Implementation of The Policy:

Discrimination

CA Grameen considers the following as breach of Code of Conduct to discriminate in the provision of the following and will be subject to disciplinary measures up to and including termination.

- employment opportunities
- benefits or privileges
- to create discriminatory work conditions
- or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, colour, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status

Harassment

Harassment refers to any kind of verbal or physical conduct designed to threaten, intimidate, or coerce an employee, co-worker, or any person working for or on behalf of CA Grameen.

CA Grameen is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive, or harassing behaviour. Any employee who feels harassed or discriminated can freely report the incident to his or her manager or to human resources department. CA Grameen prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy.

Staff must also ensure that they never verbally or physically mistreat others or engage in offensive behaviour, and they do not tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence, sexual harassment, and any other conduct that interferes with a co-worker's ability to do his or her job.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Spreading rumours or malicious untruths to slander someone's reputation (gossip)
- Shouting
- Criticizing, ridiculing, or dismissing achievements
- Degrading someone in front of other people (public humiliation)
- Inappropriate sarcasm
- Speaking in a condescending or belittling way
- Swearing at or insulting another person
- Dismissive or negative gesturing when someone else is speaking
- Refusing to speak to someone about work related matters
- Discounting the person's thoughts or feelings ("Oh, that's silly") in meetings
- Making continuously negative comments about work without substantiating or complaining without actively seeking to be involved in the solution.
- Adopting an uncooperative or domineering behaviour
- Actively undermining work and authority by destroying the goodwill between colleagues.
- Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, colour, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status, or other protected status, including epithets, slurs, and negative stereotyping.
- Nonverbal harassment includes distribution, display, or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion, or disrespect toward an individual or group because of national origin, race, colour, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status, or other protected status.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Sexual Harassment

While the policy on "*Prevention of Sexual Harassment for women at workplace*" (POSH), specifically addresses protection of women against sexual harassment, CA Grameen considers all employees, irrespective of their gender, to uphold the right to work in safe environment free from any kind of verbal or physical abuse. Hence CA Grameen, adopts this policy with gender neutrality to ensure redressal against all types of harassment to employees.

Retaliation

No hardship, loss, benefit, or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment
- Appearing as a witness in the investigation of a complaint
- Serving as an investigator of a complaint

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation. Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

Confidentiality

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR Head will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

Complaint procedure

CA Grameen has established the following procedure for lodging a complaint of harassment, discrimination, or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Complaints should be submitted as soon as possible after an incident has occurred, preferably in writing
2. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the HR head will notify senior management and review the complaint with the company's legal counsel and refer the matter to the disciplinary committee for further action
3. The disciplinary committee will initiate an investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred
4. If necessary, the complainant and the respondent will be separated during the course of the investigation, either through internal transfer or administrative leave
5. During the investigation, the disciplinary committee will interview the complainant, the respondent, and any witnesses to determine whether the alleged conduct occurred
6. Upon conclusion of an investigation, the committee will submit a written report of his or their findings to the company. If it is determined that a violation of this policy has occurred, the committee will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:
 - a) the severity, frequency and pervasiveness of the conduct
 - b) prior complaints made by the complainant
 - c) prior complaints made against the respondent
 - d) the quality of the evidence (e.g., first-hand knowledge, credible corroboration)

If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the committee may recommend appropriate preventive action.

7. Senior management will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the Head of the Organisation and other management staff as appropriate, and decide what action, if any, will be taken.
8. Once a final decision is made by senior management, the HR will intimate the disciplinary action so taken, the respondent will be informed of the nature of the discipline and how it will be executed.

Training and Awareness

CA Grameen will ensure adequate training and awareness sessions for new hires as well as existing employees on a continual basis. CA Grameen's learning management system also allows creation of various learning modules and assessments to inculcate the required trainings and measure the employee awareness on the policy elements.

Policy Review

The policy will be subject to annual review by the senior management team, followed by approval from the Board in case of any modifications.
