



SAMMAAN CAPITAL LIMITED

(Formerly known as Indiabulls Housing Finance Limited)

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Non – Discrimination and Anti – Harassment Policy

Non-Discrimination and Anti-Harassment Policy

Intent

Sammaan Capital Limited is committed to the elimination of unlawful discrimination and promotes equality and diversity in its own policies, practices and procedures and in influencing others to do the same in their dealings with employees, customers, vendors, and third parties.

Sammaan Capital Limited believes in equal treatment to all and with the same attention, courtesy and respect regardless of their age, disability, gender, marital status, race, racial group, colour, ethnic or national origin, nationality, religion, belief or sexual orientation.

Sammaan Capital Limited is committed to comply in both letter and spirit with all anti-discrimination and anti-harassment legislation and associated codes of practice in force either now or in the future. Sammaan Capital Limited has zero tolerance towards any form of discrimination or harassment that violates the statute.

Unlawful Grounds for Discrimination

Discrimination on any of the following grounds is unlawful:

- age
- race, racial group, colour, ethnic or national origins;
- gender, pregnancy, or marital status;
- disability;
- sexual orientation;
- religion or belief.

Forms of Discrimination

Sammaan Capital forbids the following discriminations:

- a) **Direct discrimination**, where a person is treated less favourably on the basis of a ground which is unlawful;
- b) **Indirect discrimination**, where a provision, criterion or practice which seems to be lawful would create a significant disadvantage for a substantial number of one group of persons compared with other persons on the basis of an unlawful ground unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary;
- c) **Victimisation**, where someone is treated less favourably than others because he or she has taken action in respect of discrimination on unlawful grounds;
- d) **Harassment**, when unwanted conduct related to any unlawful ground takes place with the purpose or effect of creating an intimidating, hostile, degrading, humiliating, or offensive environment for any person. This is not limited to physical acts and may include verbal and non-verbal communications and gestures.

Employment and Training

As an employer, Sammaan Capital treats all employees and job applicants equally and fairly and does not discriminate unlawfully against them. Sammaan Capital will ensure, for instance, arrangements for recruitment and selection, terms and conditions of employment, access to training opportunities, access to promotion and transfers, grievance and disciplinary processes, demotions, selection for redundancies, dress code, references, bonus schemes, work allocation and any other employment related activities do not constitute unlawful discrimination against any person or group of persons.

Recruitment

Sammaan Capital recognizes the value of a diverse workforce and will take steps to ensure that:

- Recruitment from the widest pool of qualified candidates possible;
- employment opportunities are open and accessible to all on the basis of their individual qualities and personal merit;
- selection criteria and processes do not discriminate unjustifiably on any of the unlawful grounds other than where we are exercising permitted positive action;
- all recruitment agencies acting for the SCL are aware of this policy and act in accordance with it.

Conditions of service

Sammaan Capital treats all employees equally and endeavour to create and maintain a working environment which is free from discrimination and harassment in any form. Employment contracts comply with antidiscrimination legislation and provision(s) of employee benefits such as working hours, leave and maternity leave arrangements, performance appraisal schemes, bonus schemes, dress codes, or any other conditions of employment will not discriminate against any employee on any unlawful grounds. Wherever it is possible and reasonable to do so, Sammaan Capital will endeavour to provide appropriate facilities and conditions of service which take into account the specific needs of employees which arise from their ethnic or cultural background; gender; responsibilities as carers; disability; religion or belief; or sexual orientation.

Promotion and Career development

Promotion within the SCL will be made without reference to any of the unlawful grounds and will be merit based. The selection criteria and processes for recruitment and promotion will be regularly reviewed to ensure that there is no unjustifiably discriminatory impact on any particular group. All employees will have equal access to training and other career development opportunities appropriate to their experience and abilities.

Promoting Equality and Diversity

In line with its commitment to anti-discriminatory and anti-harassment practices within the organization, Sammaan Capital is also committed to promoting equality and anti-discrimination and anti-harassment in areas in which it has or will have influence. This policy will be disseminated to the Sammaan Capital employees and will also be provided training appropriate to their needs and responsibilities. All stakeholders who act Sammaan Capital behalf will be informed of this policy and will be expected to act in accordance with it when conducting business on its behalf. In all its dealings, including those with vendors, suppliers, customers and recruitment agencies, Sammaan Capital will seek to promote the principles set out in this policy.

Implementing the Policy***Responsibility***

- Ultimate responsibility for implementing the policy rests with Sammaan Capital. All our employees are expected to be aware and take notice of the provisions of this policy and it shall be obligatory on them to ensure compliance with this policy while performing their duties and / or representing Sammaan Capital. Acts of discrimination or harassment on any of the unlawful grounds or failure to comply with this policy by
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- Acts of discrimination or harassment on any of the unlawful grounds by clients/vendors or requests by clients/vendors for us to carry out any act of discrimination or harassment on any of the unlawful grounds will lead to termination of our service agreement with them.

Complaints of discrimination

Sammaan Capital will treat seriously, and, where appropriate, will take action regarding all complaints of discrimination or harassment on any of the unlawful grounds made by employees, suppliers, vendors, customers or other third parties. All complaints will be investigated in accordance with Sammaan Capital grievance or complaints procedure and the complainant will be informed of the outcome.

Grievance Redressal

In the event of any complaint pertaining to any Harassment or discrimination is raised, the below levels of Redressal needs to be followed.

Level 1-: A grievant should firstly try to resolve the issue by discussing it with the reporting manager / concerned official.

Level 2 – In the event the grievant is dissatisfied with the decision or not received any resolution, the grievant should then write to the HRBP marking a copy to the Regional HR stating the reasons of dissatisfaction and include any evidence and communications that may seem inappropriate. The HRBP will arrange for a meeting with the grievant to resolve the matter.

Level 3 – Post the above stages, if the grievant continues to be dissatisfied; the grievant can appeal to the Head HR. The Head of HR will then arrange for a meeting to discuss on the said grievance to arrive at an agreement on how the issue can be resolved.

Disciplinary Action

Depending upon the nature and seriousness of the non-compliant behavior, SCL may take corrective action against erring employee(s) or vendor(s) including imposition of penalty / penalties as deemed appropriate considering the nature of violation and its implications on SCL. The extenuating/ mitigating circumstances, if any, may also be considered while taking action.

S.No	Incidence	Disciplinary Action
1	First Incidence	Written warning or counseling and disciplinary training
2	Second Incidence	Written warning, counseling, disciplinary training and deduction or withholding monetary or no-monetary benefit
3	Third / Final Incidence	Termination of employment or service contract

Sammaan Capital may also institute civil or criminal action against errant employee(s).

Monitoring and review

The policy will be monitored and reviewed on a regular basis to measure its progress and judge its effectiveness.