

HOME CREDIT

**OMBUDSPERSON
GRIEVANCE REDRESSAL POLICY- EMPLOYEES
OF
HOME CREDIT INDIA FINANCE PRIVATE LIMITED**

Version 1.1

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1. Abbreviation

Commonly used Abbreviations	Description
HCI	Home Credit India
CHRO	Chief Human Resource officer
HRBP	Human Resource Business Partner
HUB	Company Intranet for publishing information and Policies

2. Objective

The Company is committed to maintaining the highest standard of conduct and professionalism and towards this commitment, has formulated a policy that will provide clarity about the method and process for Internal stakeholders to voice/escalate genuine concerns about unprofessional conduct/ or breach of the company Code of Conduct or any other matter related to their employment concern with in HCI.

This policy should be read in conjunction with **Home Credit India Employee grievance re-dressal policy**.

This policy aims to:

- Provide an independent, informal, confidential and neutral forum by means of the Office of the Ombudsperson, for employees to raise/escalate concerns and complaints about improper practices which are in breach of the Home Credit India Code of Conduct.
- Put in place a fair and equitable inquiry process and re-dressal mechanism
- The Ombudsperson Office seeks to promote a fair conflict management system and supports systemic changes to achieve this goal.

Reassure employees raising the concerns, that each one will be fully protected against possible reprisals, intimidation, coercive action, dismissal, demotion or victimization when a serious and genuine concern of apparent unprofessional conduct has been made in good faith.

3. Scope of policy

This policy is applicable to all employees of Home Credit India.

Employees include:

1. Full time /Part time employees governed by Home Credit India rules and regulations, based at HQ and other Home Credit business locations within India
2. Employees who have resigned/Asked to leave from the services of Home Credit India

The “complainant employee” may either be an observer who is not directly impacted, or a victim who is directly or indirectly affected by such practices.

This policy also lays down the procedures to be followed for handling such Concerns by the office of Ombudsperson.

4. Power & Authority

- Using an alternative dispute resolution (ADR), an organizational ombudsperson provides options for all “Concerned persons” who seek to bring their concerns forward safely and effectively
- Ombudsperson at HCI acts as appellate authority for employees, who wants the decision taken by management to be reviewed. Decision of the Ombudsperson office shall be binding to all the parties.
- Ombudsperson at HCI, offers coaching on ethics and other management issues, provides mediation to facilitate conflict resolution, helps enable safe upward feedback, assists those who feel harassed and discriminated.
- Ombudsperson at HCI will act when concern is raised against senior management.
- Ombudsperson at HCI can be approached where employee feels concerns can't be raise to managers/management, for the fear of reprimand.
- Ombudsperson at HCI aim to bring systemic concerns to the attention of the organization for resolution and process improvements.

5. Protection

The process is designed to offer protection to whoever discloses/escalates concerns regarding unprofessional conduct to the Ombudsperson or, if the complainant prefers, to any other person in the organization, provided the disclosure is made in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in Home Credit India **Code of conduct**.

A concerned employee is not a 'trouble maker' or 'sneak' but a person who has come to the decision to express a concern regarding possible unprofessional conduct, after a lot of thought. The onus of proving the allegation shall not lie upon the complainant however he/she may be during the course of any enquiry requested to produce any proof/evidence or any other related matter to support the claim made.

The policy only requires that there be a genuine concern - the person making the complaint is not expected to produce unquestionable evidence in support of the allegation.

The Company has an obligation to ensure that a complainant who makes a disclosure in good faith and without malice is protected, regardless of whether or not the concern raised is ultimately found to be correct. No action shall be required to be taken against the complainant when an allegation made in good faith is not confirmed by subsequent investigation. The Company affirms that it will not allow the person raising/escalating a concern to be victimized for doing so.

In the unfortunate event where the person would be victimized, the Company will treat this as a serious matter and take disciplinary action against the perpetrator.

The Ombudsperson will not reveal evidence of unprofessional conduct, and the Company will take disciplinary action if an employee destroys or conceals any relevant evidence.

However, if an allegation is made or a concern is raised frivolously, maliciously or for personal reasons, the Company may decide to take appropriate disciplinary or legal action against the complainant.

5.1 Confidentiality

The Ombudsperson will treat all disclosures in a confidential and sensitive manner.

The identity of the person raising the concern will be kept confidential so long as it does not hinder or frustrate the investigation process. However, the investigation process may reveal the source of the information on a 'need-to-know-basis' and, under exceptional circumstances only to the parties privy to competent people/Ombudsperson office, the person making the disclosure may be required to furnish written statement during the course of an enquiry not amounting to any legal statement as part of the evidence.

5.2 Neutrality

Ombudsperson will not serve as advocate for any party to a dispute, including management. However, Ombudsperson do advocate for fair processes and fair administration of those processes by organizations. While making recommendations, Ombudsperson will have the responsibility to suggest actions or policies that will be as equitable as possible for all parties involved.

Home Credit India Ombudsperson, as designated neutrals, remain unaligned and impartial. The Ombudsperson will not engage in a situation which could create a conflict of interest.

5.3 Informality

Home Credit India Ombudsperson shall ensure speedy disposal of the complaint. For this, the Ombudsperson shall have the authority to adopt any process/ method which may not be formal or recorded as per the Company Policy.

Home Credit India Ombudsperson functions on an informal and off-the-record basis by such means as listening to employees who visit, call or write into their office, providing and receiving information, identifying and reframing issues, developing a range of responsible options, and — with permission given to the Ombudsperson in the course of discussions and at the Ombudsperson's discretion — making informal inquiries.

HCI Ombudsperson provide an informal resource to the HCI employees. They do not participate in any formal adjudicative or administrative procedure related to concerns brought to their attention.

HCI Ombudsperson do not conduct formal investigations, adjudicate, arbitrate, or serve as witnesses in any administrative or legal proceedings either at HCI or elsewhere. Ombudsperson's office shall have the authority to get the above mentioned activities managed through other functions of the company

Accordingly, management at HCI will be considered to have agreed to abide by these principles and not to seek to compel the Ombudsperson or their staff to testify with respect to confidential communications.

5.4 Independence

HCI Ombudsperson office is independent in structure, function, and appearance. An Ombudsperson functions independently of line management.

The Ombudsperson reporting relationship is with the highest authority in an organization. HCI Ombudsperson reports to the Board of Directors.

6. Office of the ombudsperson

The Ombudsperson will administer the policy, for which he/she will have an office with the necessary facilities, ensuring complete confidentiality.

Any exception to the policy will be required to be approved by the Board of Directors

Complaints to Ombudsman office can be received as defined in section 3

7. Grounds of Raising a Concern

1) Employees can raise their concerns/ grievances to the Ombudsperson office in matters, where standard process for resolution does not exist or employee is not happy with the resolution provided or in case of confidentiality, such as and not limited to:

- Mis-commitment
- Unfair treatment at workplace
- Issues regarding employment terms and conditions
- Misuse of company property
- Internal fraud
- Harassment
- Integrity issues

But not limited amounting to any other issue which affects their core duties. **Standard complaints redressal process and escalation matrix:**

Home Credit India has a well-defined and structured employee grievance re-dressal policy and process. All concerns should follow the standard approach as defined below:

2) Employee grievance redressal matrix

- Level 1- Discuss or e-mail to Line Manager/Skip level
- Level 2- Write an e-mail to HR on common email ID myHR@homecredit.co.in (myHR)
- Level 3- Write an e-mail to person/authority in the escalation matrix, which here is CHRO.
- Level 4- Complaint in appropriate form (along with copies of earlier correspondence with concerned office/department/authority) to Ombudsperson

However a concern can also be raised directly to Ombudsperson office in-case if it is for Senior Management, or out of the concern of confidentiality or incase if there is a threat of intimidation or prejudice.

7.1 Procedure for addressing a concern/complaint

7.1.1. How to voice a concern -An employee wishing to raise a concern may do so with the Ombudsperson, verbally or in writing by giving background and history of the unprofessional conduct, the reason and grounds for raising the concern, the identity of the individuals who may be involved and documentary evidence, wherever available. The earlier the concern is raised, the better.

Complaints may be sent in either of these forms:

1. in writing (through hard copy mail) to:

The Ombudsperson

Home Credit India Finance Private Limited

Infinity Towers, Tower C, 3rd floor,

DLF Phase-2, Gurgaon-122001, India

2. in writing (through email) to a secure email id- ombudsperson@homecredit.co.in
 1. Write on "Contact us" page on our Home Credit India website (To be introduced later)
 2. By calling on dedicated secured phone line between 9.00am to 5.30pm from Monday to Friday on (To be introduced later)

7.1.2: Complaints/Concerns review process

Review and acceptance of complaints

Ombudsperson office will review all the complaints received by them and would reject complaints, if they belong to the following categories:

- 1) If the complainant hasn't approached Home Credit earlier or the matter is already under consideration by the standard redressal channels. The complaint would be accepted only if Home Credit has
 - Not acted within the defined turnaround time or has been rejected or cancelled by the standard redressal process or
 - No reply received within one month post the concern was raised or
 - Employee is not satisfied with the reply/resolution given
- 2) If the complaint has been made to Ombudsperson later than one year after the cause of action.
- 3) If the complaint is in regards to the same subject matter which was settled through Ombudsperson in any previous proceedings
- 4) If the complaint for same subject matter is pending before any court, tribunal or arbitrator or a final order has already been passed by such an authority
- 5) If the complaint is frivolous, vexatious or malafide in nature or it is pursued without sufficient cause and reasonable diligence,

8) If the complaint is outside the purview of the scheme (e.g. Sexual Harassment of female employee)

7.1.3. The complaint re-dressal process

The policy provides for an investigation and resolution process in 3 stages:

- **Stage 1:** When a matter is referred to the Ombudsperson, he/she will conduct a preliminary review to determine whether there is, at first face, a case for pursuing the matter further.

First time complaints by the employees for which standard re-dressal process exists, will be redirected to myHR@homecredit.co.in and to the respective HRBP, for re-dressal.

For other valid concerns, the Ombudsperson will hear the complainant and review the documentary evidence, if any

- **Stage 2:** If the findings from stage 1 confirm the employee's allegations/concerns, the Ombudsperson will then initiate a **preliminary investigation. This investigation will include the following steps:**

2a. Case review with the respective HRBP. Evidences in support of the complete case to be reviewed.

2b. Talk to both complainant and the accused party informally. The Ombudsperson may if need to be ask for supporting's from concerned departments/individuals.

In most cases, the complaint can be resolved at this stage itself.

- **Stage 3:** Should this preliminary investigation confirm the issue raised and it is found to be of a nature requiring a **full investigation**, the Ombudsperson will hear any other parties or witnesses he/she wishes to call. During the process of investigation, Ombudsperson office will seek support of relevant departments like Security, HR, Legal and Compliance, Internal Audit or others to investigate the case further, gather evidences and submit their findings.

While investigating the complaint, the Ombudsperson will take into account the following factors:

- the seriousness of the alleged improper conduct
- the credibility of the concern
- the likelihood of getting confirmation about the improper practice from attributable sources

Timelines:

1. Understand the concern/complaint, review evidences and interact with person who raised the concern- within 2 working days of receiving the concern/complaint
2. Update on status and/or possible solution to the person who raised the concern- within 10 working days of receiving the complaint
3. Max TAT for complaint resolution, where all parties are available and responding- 30 days

7.1.4. Key considerations:

- The investigation and resolution will be handled with agility and confidentiality understanding the sensitivity of the issue.

- However, to ensure that fairness will not be compromised, hasty investigation procedures will be avoided, which may from time to time lead to some delayed resolution in cases involving multiple parties/evidences.
- The identity of the complainant will be kept confidential. It will be disclosed only where strictly necessary or when there is an overriding need for such disclosure.
- Any requirement for disclosure will be notified to and its implications discussed with the complainant in advance.

7.1.5 Position of person against whom a concern is raised

The person against whom the complaint has been made will be given an opportunity to be heard by the Ombudsperson as soon as possible after receipt of the complaint and comment and state his/her position again before the investigation is finally concluded.

8. Resolution and actions taken

Resolution of the complaint may be achieved at any of the 3 levels in the investigation process.

The 1st priority of the Ombudsperson office is to provide a fair, mutually beneficial resolution and close the complaint and recommend process changes to prevent such incidences in future.

In case the findings of the investigative process support the allegation/concern, action will be taken against the perpetrator(s) and alternate solution set to be provided, where required.

The Ombudsperson will prepare a detailed report of the final result, including recommended action to be taken if the complaint/disclosure is found to be genuine.

A summary report with recommended action in line with the Company's Disciplinary Policy, will be sent to the relevant HR management members.

The Ombudsperson will ensure that any action taken will be in proportion to the severity of the wrongdoing.

All enquires/investigations shall be supported by Incident Report and other related documents while closing the matter.

Furthermore, at the time of positive closure a written confirmation or on recorded phone line, shall be taken by concerned person confirming that he/she is satisfied with the resolution provided. In case of a negative outcome similar communiqué can be made to both the parties

9. Archival and Purging

Apart from above, Ombudsman office will maintain and track all concerns and their resolution, will store and archive all evidences and supporting's in a confidential manner and identify areas of improvement in the standard processes and recommend to the management team.

All the documents/ information pertaining to the matters raised before Ombudsperson shall be preserved in original at least for 12 months from the date of closure of matter by Ombudsperson and in soft/ scan copies for another 24 months after the completion of such 12 months.

10. Reporting

A quarterly report will be prepared by the Ombudsperson for review by the Board of Directors.

There will be a regular communication with the CHRO and the Process Excellence team, on recommendation for process improvements where possible, to prevent more such issues in future.

11. Communication and implementation of the Ombudsperson policy

The implementation of this policy will be the responsibility of the Ombudsperson.

A copy of the policy is available to all employees on the company intranet "HUB".

The policy will be explained to new joiners at the time of induction and continuous communication will ensure that awareness of the Code of Conduct and Ombudsperson Policy is cascaded to all levels in the organization.