

**POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL
HARASSMENT AT THE WORKPLACE (POSH POLICY)
OF**

UNIFINZ CAPITAL INDIA LIMITED

VERSION: 1.6

APPROVED BY THE BOARD OF DIRECTORS

ON

08TH AUGUST, 2026

Sd/-

**KAUSHIK CHATTERJEE
CHIEF EXECUTIVE OFFICER**

Version Control

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Index

1	INTRODUCTION	4
2	SCOPE AND APPLICABILITY.....	4
3	REGULATORY CONTEXT	5
4	DEFINITIONS	5
5	ROLES AND RESPONSIBILITY	8
6	CONSTITUTION OF INTERNAL COMMITTEE	9
7	COMPLAINT REDRESSAL MECHANISM	11
8	ANNUAL REPORT	19
9	TRAINING AND AWARENESS	20
10	REVIEW OF POLICY	20
	Annexure – 1	21
	Annexure-2	22

1 INTRODUCTION

Unifinz Capital India Limited (hereinafter referred to as “Company” or “UCIL”) is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equal and respectful treatment. We at UCIL are also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at Workplace, that includes prohibition and redressal of Sexual Harassment should it occur.

At UCIL, the Company will not tolerate any form of Sexual Harassment and is committed to take all necessary steps to ensure that its employees (men or women) are not subjected to any form of harassment. This Policy shall apply to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees, contractual, third-parties and employees coming on visit at business premises. We at UCIL are committed to giving every employee a just and fair hearing on issues that are raised on complaints of Sexual Harassment and will take disciplinary action against any victimization of the Complainant or the Respondent that may result from a Complaint.

2 SCOPE AND APPLICABILITY

Scope:

This Policy shall cover the process to investigate and redress complaints of Sexual Harassment at the Workplace.

While the PoSH Act’s applicability is limited to women Employees, this Policy is gender-neutral extending the benefits of the provisions to all Employees, irrespective of their gender. Therefore, any Employee, regardless of gender, can file a complaint of Sexual Harassment under this Policy in the context of the Workplace.

This Policy does not cover:

- Interactions or engagements in personal capacity, even if they started in the Workplace.
- Any complaints that do not fall under the definition of Sexual Harassment.

Applicability

This Policy pertaining to Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (herein after referred to as “Policy”) is applicable to:

- a. Employees, whether full-time, part-time, temporary, adhoc or daily wage basis, either directly or through an agent and includes contractual personnel, probationers, trainees, apprentices and interns.
- b. Customers, vendors and their Employees, consultants, and anyone else doing business at the organization’s Workplace or interactions arising from any work being carried out by or on behalf of the organization.
- c. Anyone who is present in the Workplace such as candidates, visitors, guests, etc.

3 REGULATORY CONTEXT

This Policy has been framed in accordance with the provisions of following Act and Rules:

- a. *The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* (hereinafter referred to as “the POSH Act”) and
- b. *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013* (hereinafter referred to as “the POSH Rules”)

While the POSH Act provides statutory protection to women, the Company is committed to maintaining a workplace free from sexual harassment for all employees irrespective of gender. Accordingly, wherever this Policy extends protection beyond the statutory requirements, such provisions shall operate as an internal code of conduct.

In case of conflict between the terms under this Policy and the POSH Act and rules made thereunder, the terms under POSH Act shall prevail over the terms under this Policy. Local country laws will take precedence over this Policy in other geographies, if applicable.

4 DEFINITIONS

- a. **“Aggrieved Person”** in relation to a Workplace, a person, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- b. **“Appellate Authority”** shall be the authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946 (or any statutory re-enactment or replacement thereof), or such Court or Tribunal having jurisdiction in accordance with applicable laws.
- c. **“Complainant”** is either the Aggrieved Person or a person authorized by the Aggrieved Person who is raising the Complaint.

- d. **Competent Authority**" means the Chief Executive Officer (CEO) of the Company or such other officer as may be authorized by the Board of Directors from time to time, who shall act on behalf of the Employer for the purpose of implementing the recommendations of the Internal Committee and imposing disciplinary or other actions in accordance with this policy. Provided that where the complaint is against the CEO, or where the CEO has a conflict of interest, the Competent Authority shall be the Board of Directors.
- e. **"Employee"** means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal Employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- f. **"Employer"** means the Company acting through its Board of Directors and includes the Chief Executive Officer, or any other person authorised by the Board who is responsible for the management, supervision and control of the Company's workplace, including the formulation and administration of the Company's policies.
- g. **"Respondent"** refers to any 'person' against whom the aggrieved person has made a complaint.
- h. **"Sexual Harassment"** may occur not only when a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an Employee and someone that the Employee deals with in the course of their work who is not employed by the organization.
 - i. Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but is not limited to: unwelcome sexual advances involving verbal, non- verbal, or physical conduct, implicit or explicit;
 - ii. physical contact and advances including (but not limited to) touching, stalking, sounds that have explicit and /or implicit sexual connotation/overtones, molestation;
 - iii. teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will or an act likely to intrude upon one's privacy;
 - iv. demand or request for sexual favours;
 - v. sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;

- vi. display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work- related areas;
- vii. showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.;
- viii. repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- ix. giving gifts or leaving objects that are sexually suggestive;
- x. persistent watching, following, and contacting of person;
- xi. any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.: -

Following circumstances, among other circumstances, if it occurs, or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment:

- i. implied or explicit promise of preferential treatment in employment;
- ii. implied or explicit threat of detrimental treatment in employment;
- iii. implied or explicit threat about present or future employment status;
- iv. interference with work or creating an intimidating or offensive or hostile work environment;
- v. humiliating treatment likely to affect health or safety;
- vi. threat, intimidation, or retaliation against an Employee who speaks about unwelcome behaviour with sexual overtones/ connotations.

Explanation: Sexual Harassment is a pervasive issue that extends beyond physical spaces into the virtual realm. Virtual Sexual Harassment involves unwelcome and inappropriate behaviours through digital platforms. This can include explicit messages, unsolicited images or videos, or online stalking.

- i. **“Workplace”** includes all offices and branches opened by the Company in India. It also includes any place visited or arising out of or during the course of employment/work including transportation provided by UCIL for undertaking the journey.

Explanation: Workplace refers to any location, premise, or space, whether physical, virtual, or otherwise, where an Employee carries out work-related activities or duties for and on behalf of an organization. This encompasses not only the primary Workplace but also any off-site or remote

location where work is performed, official events, work-related travel, or any other setup where work-related interactions occur.

5 ROLES AND RESPONSIBILITY

5.1 Roles & Responsibility of Internal Committee

The Internal Committee shall be responsible for:

- a. Receiving complaints of Sexual Harassment at the Workplace;
- b. Initiating and conducting inquiry as per the established procedure;
- c. Submitting findings and recommendations of inquiries;
- d. Coordinating with the Employer in implementing appropriate action;
- e. Maintaining strict confidentiality throughout the process as per established guidelines;
- f. Submitting annual reports in the prescribed format to the Company.
- g. To be fair while making the assessment of the situation, investigation and giving the verdict.
- h. Follow the principles of natural justice and treat the Complainant, Respondent, Witnesses and Related persons to the inquiry with dignity and respect.

5.2 Roles & Responsibility of Employer

Every Employer shall be responsible for:

- a. provide a safe working environment at the Workplace which shall include safety from persons coming into contact at the Workplace.;
- b. display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassment;
- c. organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and this Policy and orientation programmes for the members of the Committee;
- d. provide necessary facilities to the Committee dealing with the complaint and conducting an inquiry;
- e. assist in securing the attendance of the Respondent and witnesses before the Internal Committee;
- f. make available such information to the Committee as it may require having regard to the complaint made by the aggrieved person;

- g. provide assistance to the Complainant if the Complainant so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force;
- h. cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the aggrieved person so desires, where the perpetrator is not an employee, in the Workplace at which the incident of Sexual Harassment took place;
- i. treat Sexual Harassment as a misconduct under the service rules and initiate action for such misconduct;
- j. monitor the timely submission of reports by the Internal Committee.

5.3 Role of External Member

The External Member is crucial for ensuring independence, impartiality, and expertise in the functioning of the Committee. Their role includes:

- a. Providing an unbiased perspective, especially in cases involving power dynamics within the organization.
- b. Offering guidance on legal, social, and procedural aspects of sexual harassment cases.
- c. Helping ensure transparency and fairness throughout the inquiry process.
- d. Acting as a safeguard against internal collusion or favoritism

6 CONSTITUTION OF INTERNAL COMMITTEE

To prevent instances of Sexual Harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Committee" (hereinafter referred as "Committee"), shall be constituted by the Board of Directors as per the POSH Act wherein: -

- a. **Presiding Officer (Chairperson):** Presiding Officer who shall be a woman employed at senior level at Workplace from amongst the employees;

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Workplace.

Provided further that in case the other offices or administrative units of the Workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other Workplace of the same Employer or other department or organization;

- b. **At least two employee members:** Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- c. **One external member:** One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment (hereinafter referred as “External Member”)
- d. **Minimum Members & Gender Representation:** *The Internal Committee shall comprise of a minimum of four Members with at least one-half of the total Members so nominated shall be women, including the Presiding Officer.*

Present Composition of the Committee is mentioned in **Annexure-1**.

Functions and Powers of the Committee:

For the purpose of making an inquiry, the Committee shall have the same powers as are vested in a civil court the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:

- a. Receiving complaints of sexual harassment.
- b. Conducting inquiries in accordance with the principles of natural justice.
- c. Recommending suitable action based on the outcome of the inquiry.
- d. Assisting the employer in implementing preventive measures and spreading awareness.
- e. summoning and enforcing the attendance of any person and examining him on oath;
- f. requiring the discovery and production of documents; and
- g. any other matter which may be prescribed.

The Internal Committee shall act only as the inquiry and recommending authority. The Committee shall not impose any disciplinary penalty.

Tenure of the Committee Members: The Presiding Officer and every Member of the Committee shall hold office for a period not exceeding three (3) years from the date of their nomination, or for such shorter period as may be specified by the Employer, in accordance with the provisions of the applicable law.

The External Member may be re-appointed upon completion of the initial tenure. While each term of appointment shall not exceed three (3) years, there is no restriction on the re-nomination or re-

appointment of the same External Member for one or more subsequent terms, subject to the Employer's discretion and continued eligibility under the applicable law.

Remuneration: The External Member appointed shall be paid such fees or allowances for holding the proceedings of the Committee, by the Employer, as may be prescribed. Other Members of the Committee shall not be entitled for the fees or allowances.

Resignation: A Presiding Officer or any other member (including external Member) of the Committee may resign at any time by tendering his resignation in writing to the Company.

Removal or Replacement of Presiding Officer or Committee Members: In the event that the Presiding Officer and / or any member of the Committee:

- a. contravenes the provisions of the Policy and Posh Act and rules made thereunder;
- b. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her; or
- c. he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- d. has so abused his position as to render his continuance in office prejudicial to the public interest,

such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of the Posh Act.

7 COMPLAINT REDRESSAL MECHANISM

7.1. Lodging a Complaint

The Complainant must submit a detailed written and signed complaint, which can be sent via email , along with any documentary evidence available or names of witnesses, to any of the committee members at the Workplace.

The complaint must be lodged within 3 months from the date of incident/ last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Committee shall render all reasonable assistance to the women for making the complaint in writing.

If the aggrieved person is unable to lodge the complaint due to Physical incapacity, any of the following persons may lodge the complaint on their behalf, with the aggrieved person's written consent.

- a. her relative or friend; or
- b. her co-worker; or
- c. an officer of the National Commission for Women or State Women's Commission; or
- d. any person who has knowledge of the incident, with the written consent of the Aggrieved Person;

If the aggrieved person is unable to lodge the complaint due to Mental incapacity, any of the following persons may lodge the complaint on their behalf, with the aggrieved person's written consent.

- a. His/her relative or friend; or
- b. a special educator; or
- c. a qualified psychiatrist or psychologist; or
- d. the guardian or authority under whose care he/she is receiving treatment or care; or
- e. any person who has knowledge of the incident jointly with him/her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care;

where the aggrieved person is dead, a complaint may be filed by legal heir or any other person who has knowledge of the incident, with the written consent of his/her legal heir.

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee. Wherever possible, Company shall ensure that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin. All reported matter shall be duly forwarded to the Committee within 7(Seven) Days of receiving the complaint.

7.2 Receipt of Complaint

Dealing with incidents of harassment is not like any other type of dispute. Complainant may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are to be kept in mind by the receiver of the complaint:

Complaint is listened to and the Complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily;

Situation is not be pre-judged. Written notes to be taken while listening to the person. Complainant is allowed to bring another person to the meeting if she wishes. When taking accurate notes, Complainants' own words, where possible, to be used. Clear description of the incident in simple and direct terms to be prepared and details to be confirmed with the Complainant;

All notes to be maintained strictly confidential. Complainant's agreement to be taken to allow proceeding with the matter, which involves a formal investigation;

The Complainant to be advised that although the process is confidential, the Respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the Complainant's identity.

Care is to be taken to prevent any disadvantage to or victimization of either the Complainant or the Respondent

7.3 Resolution Procedure Through Conciliation

Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the Complainant and the Respondent. This is only if requested by the aggrieved person. Provided that no monetary settlement shall be made as a basis of conciliation.

It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the Respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.

In case a settlement is arrived at, the committee shall record the settlement so arrived & forward the same to the Employer for taking appropriate action as specified in the recommendation. Resolution through conciliation happens within 15 days of receipt of complaint.

The committee provides copies of the settlement to aggrieved person & Respondent. Once the action is implemented, no further inquiry shall be conducted by the Committee

7.4 Manner of inquiry into Complaint

The committee shall proceed to initiate inquiry into the Complaint in the following cases:

- a. No conciliation is requested by aggrieved person;
- b. Conciliation has not resulted in any settlement;

c. Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent;

The committee shall proceed to make an inquiry into the complaint within a period of 7 days of its receipt of the original complaint/ closure of conciliation/ repeat complaint as the case may be.

Provided further that where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.

The Complainant shall submit the complaint along with supporting documents and the names and addresses of the witnesses via email.

The receiver of the Complaints sends a formal acknowledgment to the complainant, confirming receipt of the complaint.

Upon receipt of the complaint, the committee shall send 1 copy of the complaint received from aggrieved person to Respondent within a period of 7 working days.

Respondent shall file their reply to the Committee along with all supporting documents and names and addresses of witnesses, within a period not exceeding 10 working days from the date of receipt of receiving the copy of the complaint by the Respondent

No legal practitioner can represent any party at any stage of the inquiry procedure

The Committee shall Conduct inquiry into the complaint in accordance with the principles of natural justice and procedural fairness.

A minimum of **three (3)** Committee members, including the Presiding Officer, shall be present during the inquiry proceedings.

7.6 Interim relief

During pendency of the inquiry, on a written request made by the aggrieved person, the committee may recommend to the Employer to –

- a. Transfer the aggrieved person or the Respondent to any other Workplace;
- b. Grant leave to the aggrieved person of maximum 3 months, in addition to the leave he/she would be otherwise entitled;
- c. Prevent the Respondent from evaluating, reviewing or influencing the performance appraisal of the Aggrieved Person;
- d. Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the Employer will inform the committee regarding the same and send the report of such implementation to the Committee

The initiation of any legal proceedings by the Aggrieved Person shall not preclude or suspend the inquiry by the Committee. The Committee shall continue its inquiry independently in accordance with the applicable provisions of the POSH Act and this Policy.

7.7 Termination of Inquiry

Committee may terminate the inquiry or give ex-parte decision on the Complaint, if Complainant or Respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.

7.8 Inquiry procedure

The Committee shall conduct the inquiry in accordance with the principles of natural justice and procedural fairness, ensuring that both parties are provided an equal opportunity to present their case and that the inquiry is conducted impartially, objectively, and without bias.

Step 1 All proceedings of the inquiry shall be documented and maintained as part of the official record.

Step 2 The Committee shall interview the Respondent separately and impartially. During the interview:

- The Committee shall clearly explain the allegations made against the Respondent.
- The Committee shall identify the Complainant, unless confidentiality requirements under applicable law or Policy require otherwise.
- The Respondent shall be given a full and fair opportunity to present their response, submit supporting evidence, and identify witnesses, if any.

Step-3 Detailed notes of the meetings are to be prepared which may be shared with the Respondent and Complainant upon request.

Step 4 Any witnesses produced by the Respondent are also to be interviewed & statements taken on record.

Step 5 If the Complainant or Respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements.

Step 6 If the Complainant or the Respondent wishes to ask questions of the other party, they shall submit the questions to the Committee. The Committee shall put the questions to the other party, as appropriate, and record the responses.

Any such inquiry to be completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry was commenced.

In the event, the aggrieved person chooses to take recourse to law, the organization may at its sole discretion decide to not pursue the matter further.

7.9 Considerations while preparing inquiry report

While preparing the findings/recommendations, following are considered:

- a. Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature;
- b. Whether the allegations or events follow logically and reasonably from the evidence;
- c. Credibility of Complainant, Respondent, witnesses and evidence;
- d. Other similar facts, evidence, for e.g. if there have been any previous accounts of harassment pertaining to the Respondent;
- e. Both parties have been given an opportunity of being heard ;

A copy of the proceedings shall be made available to both parties enabling them to make representation against the findings

A copy of the final findings is shared with the Complainant and the Respondent to give them an opportunity to make a representation on the findings to the committee.

7.10 Action to be taken after inquiry

Post the inquiry the committee shall submit its report containing the findings and recommendations to the Competent Authority, within 10 days of completion of the inquiry. The findings and recommendations shall be based upon the facts established and is recorded accurately consideration of the following –

- Nature of evidence in support of the allegation;
- Leading circumstances culminating in Sexual Harassment;

- Discrepancies, if any, in the allegations and the submission made by the victim and his/ her witnesses;
- Grounds for review or counter allegations/ evidences from the Respondent.

The Competent Authority shall consider the Inquiry Report and recommendations of the Internal Committee and shall pass the final order, including disciplinary action, if any, in accordance with the applicable Service Rules and HR Policies of the Company

- **Complaint substantiated**

Where the committee arrives at the conclusion that the allegation against the Respondent has been proved, it recommends to the Competent Authority and this may include:

- a. to take necessary action for Sexual Harassment as misconduct, in accordance with the applicable service rules and policies;
- b. Undergoing a Counseling Session;
- c. Censure or reprimand;
- d. A written apology to be tendered by the Respondent;
- e. a letter of warning may be placed in the personal file of the Respondent;
- f. Withholding promotion and/or increments;
- g. Suspension;
- h. Termination from the service;
- i. register an FIR against the Respondent in case the act alleged, prima facie constitutes an offense under the Indian Penal Code;
- j. deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/ her legal heirs; or
- k. any other action that the Management may deem fit subject to applicable laws and internal policies of the Company.

Additionally, the Competent Authority at its sole discretion, shall provide the facility to pay the compensation by the Respondent to the aggrieved person on the basis of the income and financial status of the Respondent feasibility of such payment in lump sum or in instalments:

- a. the mental trauma, pain, suffering and emotional distress caused to the Aggrieved Person;
- b. the loss in the career opportunity due to the incident of Sexual Harassment;
- c. medical expenses incurred by the victim for physical or psychiatric treatment;

The Competent Authority shall act upon the recommendations given by the Committee within 60 days of receiving the report from the Committee.

Further if complaint received against any Committee member, then the Committee shall be reconstituted.

While implementing the order, the Competent Authority will ensure that the name of the aggrieved person, Respondent and any other employee/s are always kept confidential. Suitable action to be recommended by the Committee for any violation of confidentiality as mentioned above.

The Competent Authority shall send a closure report to the committee within 7 days after the recommendations have been implemented.

If the situation so requires, or upon request of the Complainant, Respondent or witness, Competent Authority may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

Post implementation of the actions, follow up with the Complainant occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow up is undertaken by the Complainant's Line Manager supported by HR.

- **Complaint unsubstantiated**

Where the committee arrives at the conclusion that the allegation against the Respondent has not been proved, it recommends to the Competent Authority that no action is required to be taken in this matter.

Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the company.

- **Malicious Allegations**

Where the committee arrives at the conclusion that the allegation against the Respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the Competent Authority to take action against the aggrieved person or the person making the complaint.

The action recommended should be similar to the ones proposed for the Respondent in case of substantiated complaints.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

In case a witness has given false evidence or produced any forged or misleading document during the inquiry, the Committee may recommend to the organization to act against the witness.

7.11 Confidentiality

The identity of the Complainant, Respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the Competent Authority is considered as confidential materials, and not published, communicated or made known to public or press and media in any manner.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the Act.

7.12 Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made by the Committee or the order of the Competent Authority, may prefer an appeal to the Appellate Authority, within 90 days of the recommendations being communicated.

7.13 Timeline Matrix

To facilitate timely handling of complaints and ensure compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the indicative timeline matrix shall apply to the complaint redressal process under this Policy. The timelines matrix is given as per Annexure-2. In the event of any inconsistency, the provisions of the applicable law shall prevail.

8 ANNUAL REPORT

Internal Committee shall in each calendar year prepare an annual report and submit the same to the Employer and the District Officer.

The Employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of the Company.

9 TRAINING AND AWARENESS

The Company is committed to create and maintain a workplace that is free from sexual harassment through continuous awareness, education, and capacity building.

The Company shall organize periodic awareness programmes and sensitization sessions for all employees to promote understanding of the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), this Policy, acceptable workplace behaviour, and the complaint redressal mechanism.

The Company shall ensure that every employee receives appropriate information regarding this Policy at the time of joining the organization and whenever the Policy is revised.

Members of the Committee shall undergo periodic training to enable them to effectively discharge their duties under the POSH Act. Such training shall include, among other things, the legal framework governing sexual harassment, principles of natural justice, inquiry procedures, evidence appreciation, report writing, confidentiality obligations, and handling complaints with sensitivity and impartiality.

Records of training and awareness programmes conducted under this Policy shall be maintained by the Human Resources Department of the Company.

10 REVIEW OF POLICY

The Company reserves the right to revise the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

Annexure – 1

The Internal Committee comprising of the following Members:

Sl. No.	Name	Role	Contact
1	Mrs. Ritu Tomar	Presiding Officer	Unifinz Capital India Limited Corporate Office: MCT House (Floor-1), New Friends Colony, Near Sukhdev Vihar Metro Station, New Delhi - 110 025 Email: priyanka.sachdeva@lendingplate.com
2.	Mr. Srikanta Khatei	Member	
3.	Ms. Pragati Garg	Member	
4.	Mr. Devendra Singh	Member	
5.	Ms. Aparna Swapnil	Member	
6.	Mrs. Sampada Loomba	External Member	

Annexure-2

Timeline Matrix

Sl. No.	Activity / Event	Time Frame
1	Submission of Complaint	Within 3 months from the date of the incident/last incident
2	Extension for filing Complaint	Additional 3 months, if justified and reasons are recorded in writing
3	Forwarding complaint to Internal Committee (where initially received by another person)	Within 7 days of receipt
4	Resolution through Conciliation	Within 15 days of receipt of complaint
5	Initiation of Inquiry by Internal Committee	Within 7 days of receipt of complaint / failure of conciliation / repeat complaint
6	Copy of Complaint to Respondent	Within 7 working days of receipt of complaint
7	Respondent to submit Reply	Within 10 working days from receipt of complaint
8	Maximum Leave as Interim Relief	Up to 3 months
9	Notice before Ex-parte Order / Termination of Inquiry	15 days' prior written notice
10	Completion of Inquiry (including Inquiry Report)	Within 90 days from commencement of inquiry



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11	Submission of Inquiry Report to Competent Authority	Within 10 days of completion of inquiry
12	Competent Authority to implement Committee Recommendations.	Within 60 days of receiving the Inquiry Report
13	Competent Authority to submit Closure Report to Committee.	Within 7 days after implementation of recommendations
14	Appeal against Committee Recommendations	Within 90 days from communication of recommendations