

KEERTANA FINSERV PRIVATE LIMITED

Name of Policy	Prevention of Sexual Harassment (POSH) Policy
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Approving Authority	Board of Directors
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Version Control

Version	Date	Description	Description of Changes
1.0	March 2024	Prevention of Sexual Harassment (POSH) Policy	In supersession of earlier policy implemented by the Company for prevention of sexual harassment.

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PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

1. POLICY

It is the policy of Keertana Finserv Private Limited (Company) to create a workplace free of sexual harassment irrespective of their gender, race, social class, caste, creed, religion, place of origin, sexual orientation, disability, or economic status and assist individuals who believe they have been subjected to sexual harassment and seek support and remedial action.

Reference to Act(s): The policy is drafted in compliance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013 and details of complaints are disclosed in the Board of Directors' report on annual basis as per the provisions of Companies Act,2013.

2. APPLICABILITY

This policy is applicable to all the employees of Keertana Finserv Private Limited and visitors at any Registered Office, Administrative Office or Branches. This Policy is also applicable to anyone connected with the Company's business including trainees, consultants, contractors, vendors, visitors, or customers.

3. SCOPE

It covers harassment of women by men, of men by women or between the same genders. Harassment is unlawful irrespective of who is involved in such act or behaviour. The policy is not restricted to premises or branch but would remain applicable to all persons described above wherever such persons have occasion to interact with each other while on work related to the Company.

4. DEFINITIONS

"Aggrieved Person"- an employee who has filed a complaint of alleged sexual harassment.

"Employee" – an employee means any person who is employed at the workplace on permanent, temporary, full time or part time basis.

"Internal Complaints Committee (ICC)" means the committee constituted by 'Keertana Finserv Private Limited' to investigate complaints of sexual harassment, in the manner prescribed under the law.

"Local Complaints Committee (LCC)" means the committee constituted by Keertana Finserv Private Limited to investigate complaints of sexual harassment, at branches with staff of more than 10 employees, in the manner prescribed under the law.

"Respondent" means a person against whom a complaint of sexual harassment as set out in this policy has been made.

5. SEXUAL HARASSMENT

Sexual Harassment as defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013 includes any unwelcoming sexually determined behavior (whether directly or by implication) as described below:

- a. physical contact; or
- b. a demand or request for sexual favors; or

- c. sexually coloured remarks; or
- d. showing pornography; or
- e. any other unwelcoming physical, verbal, or non-verbal conduct, which is of sexual nature;
- f. A more elaborate list of behaviors that constitute sexual harassment is enclosed in Annexure A
- g. All such conduct becomes harassment when:-
 - The submission to the conduct is made a condition of employment.
 - The submission to, or rejection of, the conduct is used as the basis for an employment.
 - There is any explicit promise of preferential treatment, detrimental treatment, threat, or any humiliating treatment that may affect a person's sense of health or safety while at work.
 - The conduct creates or could create or lead to an offensive, intimidating, or hostile working environment or could interfere with work performance.
 - Additionally, the Company holds the right to prohibit any conduct that may reasonably be interpreted as harassment whether or not such conduct is pervasive and severe enough to meet the technical legal requirements of harassment.

6. HOW TO REPORT

- i. Any employee who is the recipient of any unwelcoming sexual behaviour as described by this policy or knows of the occurrence of such harassment to anyone else, is expected to report the same at the earliest.
- ii. Complaints must be made in writing so as to enable a formal investigation and enquiry into the matter. Complaints under this Policy may be lodged with the Manager (CGRM & Complaints) by sending a mail to complaints@keertana.co.
- iii. In case the employee reaches out to his/her reporting manager, HR or any other employee, they will immediately forward the complaint to complaints@keertana.co.
- iv. Manager In-charge of complaints upon receipt of any complaint which is in the nature of sexual harassment will call for the meeting of IC. IC is formed with the following members.

S.No	Members
1.	AVP/ VP – HR
2.	Manager (CGRM & Complaints)
3.	Company Secretary
4.	Person with NGO experience / legal knowledge

Note :- The format of the complaint is prescribed in Annexure B.

7. REDRESSAL PROCESS

- i. Upon receiving a written complaints from the aggrieved person, the IC may initiate resolution through conciliation/mediation. If conciliation is successful between both parties, the settlement must be noted in writing.
- ii. If settlement is not arrived through conciliation, the IC will proceed with an inquiry. The inquiry will be done promptly, thoroughly and with utmost confidentiality. The inquiry findings & resolution will be documented in writing.
- iii. Those found guilty will be subjected to appropriate disciplinary action. Disciplinary actions for cases of sexual harassment may range from oral/written warnings to extension of probation, de-promotion,

withholding of increment/promotion, monetary compensation as appropriate, counselling sessions, suspension and termination from the services of the Company.

8. PROTECTION AGAINST RETALIATION

- i. Retaliation is a serious violation of this policy and any person found to have retaliated against an individual for reporting harassment will be subject to appropriate disciplinary action procedures.
- ii. Company forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case.
- iii. If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the IC.
- iv. Retaliation will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven.

9. MALAFIDE COMPLAINT

- i. If after inquiry, it is found that the complaint was raised with malafide intent, the Company can treat the person found guilty of such malafide complaint as a major misconduct and decide on appropriate disciplinary action including termination of services.
- ii. Lack of evidence to support complaint does not indicate a malafide intention.
- iii. Wrongful allegations and breaching confidentiality in this regard will be viewed seriously.

10. AGGRIEVED PERSON/WITNESSES/SUPPORTERS NOT BE PENALIZED

If a complaint of harassment is dismissed by the IC under this Policy, no action whatsoever (including the recovery of any costs involved in investigating/enquiring into the complaint) may be taken in regard to the same against the aggrieved person/witnesses/supporters.

11. CONFIDENTIALITY

It shall be the duty of all employees who have access to ensure that all complaints lodged under this Policy is kept confidential. All incidents/grievances reported will be treated seriously and sensitively with utmost confidentiality and privacy of all parties concerned as is practically possible.

12. DELAY IN FILING THE COMPLAINT

The complaint is expected to be lodged within 90 calendar days from the last date of the alleged offence. Delay, if any, will be evaluated and considered by the IC provided the aggrieved person submits sufficient cause for such delay.

If an aggrieved person is unable to complain due to any physical/mental incapacity, the following parties can complain:

- Relative/ friend
- Co worker
- An officer of National Commission for women/State women's commission
- Special educator

- Qualified psychiatrist/ psychologist
- Guardian/ authority under any person who has knowledge of the incident (only with the written consent of the aggrieved women)

13. CONSENSUAL SEXUAL RELATIONSHIPS

- i. Keertana Finserv Private Limited discourages romantic or sexual relationships between a member of management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person), because such relationships tend to create compromising conflicts of interest at work.
- ii. It is therefore in the best interest of all concerned, that if there is such a relationship, the involved parties notify management so the reporting chain can be changed to ensure no direct or indirect reporting relationship.

14. GENERAL

- i. All associates at Keertana Finserv Private Limited have a responsibility in contributing to a mature and respectful work environment. All employees are personally responsible for their actions and must ensure that their behavior does not constitute sexual harassment whether it happens deliberately or inadvertently.
- ii. Keertana Finserv Private Limited reserves the right to modify and amend the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by Keertana Finserv Private Limited from time to time.

ANNEXURE -A

Behaviors that constitute sexual harassment :-

- Harassment includes unwelcoming words, acts, or gestures.
- Any behavior that falls in this list or has the same impact as any of these, on an employee, will invite appropriate disciplinary action including separation from the organization.

Type of Harassment	Conditions
Verbal harassment	<ul style="list-style-type: none">➤ Any taunting snide remarks based on sex (including pregnancy, childbirth, or related medical condition), sexual orientation, gender identity, marital status, or personal appearance.➤ Using abusive and offensive language or comments that put down people because of their sex or sexual orientation.➤ Phone calls or messages on electronic mail or computer networks, which are threatening, abusive or offensive to associates.➤ Sexual messages, text, or images which may be perceived by the recipient as creating a hostile work environment.➤ Suggesting or insisting that someone wear revealing clothing.➤ Intrusive questions about sexual activity, Tales of sexual exploits, comments about people's (women/men) bodies or intruding on the privacy of an employee.➤ Repeated requests for sexual favours, sexual advances or repeated pressure for dates and social contact especially when person invited has refused/ignored similar invitations.➤ Sexually suggestive comments, sexually coloured propositions, insults, or threats.➤ Telling lewd jokes about sex or sexual orientation.➤ Offensive language that insults/demeans including using terms of endearment.➤ Singing or humming vulgar songs or words.

<p>Non- verbal harassment</p>	<ul style="list-style-type: none"> ➤ Graphic descriptions of pornography including graffiti in the office premises. ➤ Displaying of books, photographs, paintings, films, pamphlets, packages, etc. containing 'indecent representation of women/men'. ➤ Material that is sexual in nature, sexist, sexually explicit is displayed in the workplace, circulated, or put in someone's
	<p>workplace or belongings, or on a computer or fax machine or on the internet or any other public display system or public in the work premises.</p> <ul style="list-style-type: none"> ➤ Suggestive letters, phone calls, electronic instant messaging, or e-mail messages. ➤ Offensive gestures, staring, leering, or whistling with the intention to insult or discomfort another. ➤ Even if not directly done to a particular individual, uttering a word, making a gesture, or exhibiting any object with the intention that such word, gesture, or object be heard or seen by an associate. ➤ Tagging on suggestive posts on Social media networks. ➤ Sounds, gestures or display of offensive books, pictures, cartoons, magazines, calendars; or derogatory written materials at one's desk or workplace. ➤ Viewing, showing, or mailing pornographic posters, Internet sites, cartoons, drawing
<p>Physical Harassment</p>	<ul style="list-style-type: none"> ➤ Intentional touching of the body, e.g., unwelcome hugs, kisses, brushing, fondling etc. ➤ "Accidentally" brushing sexual parts of the body ➤ Any displays of affection, which can make others uncomfortable or are inappropriate at the workplace ➤ Indecent exposure or coerced sexual intercourse. ➤ Use of technology to induce different remote sensations on the body including, but not limited to pain and sexual stimulation, Sexual assault or using criminal force to any woman, intending to outrage, or knowing it to be likely that he will thereby outrage her modesty.

ANNEXURE B

Form for lodging Complaint under POSH

Date : _____

Name, designation & address of victim(s)/ aggrieved :

_____ Name,

designation & address of respondent(s):

Complaint :-

Signature and Date