

DOCUMENT CONTROL

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Statement of Confidentiality

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PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY	3
1. INTRODUCTION	3
2. GENERAL CLAUSES	3
3. SCOPE/ COVERAGE	4
4. OBJECTIVE/ PURPOSE	4
5. DEFINITIONS	5
6. INTERNAL COMPLAINTS COMMITTEE (ICC)	6
7. WHAT CONSTITUTES SEXUAL HARASSMENT	7
8. PREVENTION OF SEXUAL HARASSMENT – PREVENTIVE MEASURES	8
9. COMPLAINT, INQUIRY AND REDRESSAL PROCEDURE	8
10. ACTION ON COMPLETION OF INQUIRY	10
11. THIRD PARTY HARASSMENT	11
12. FALSE OR MALICIOUS COMPLAINTS	11
13. CONFIDENTIALITY	12
14. REPORTING	12
15. REVIEW OF POLICY	12

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

1. INTRODUCTION

Satin Finserv Limited (“SFL”) believes that all employees and persons associated with or dealing with SFL have the right to be treated with dignity, respect and fairness. Sexual harassment in any form is a serious offence, is strictly prohibited, and is punishable in accordance with applicable law.

SFL is committed to providing and maintaining a safe, secure and conducive work environment that is free from discrimination, victimisation, gender bias and sexual harassment, and that enables employees to perform their duties without fear or prejudice.

This Policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as **the “Act”**) and the Rules made thereunder, with the objective of preventing sexual harassment at the workplace and providing a robust mechanism for prohibition, redressal and resolution of complaints of sexual harassment, should any such incident occur.

All employees are expected to uphold the highest standards of ethical conduct at the workplace and in all professional interactions with colleagues, customers, business partners and other stakeholders. Compliance with this Policy and the guidelines contained herein is mandatory. Any act of sexual harassment at the workplace shall be treated as a serious misconduct and shall constitute a violation of the terms and conditions of employment, warranting appropriate disciplinary action. Accordingly, employees have a responsibility to:

- Treat all colleagues, associates and persons dealing with SFL with dignity, respect and fairness at all times;
- Comply with the letter and spirit of applicable laws, Company policies and ethical standards;
- Refrain from engaging in any unwelcome conduct, behaviour or communication of a sexual nature, whether verbal, non-verbal, physical or electronic;
- Refrain from creating, encouraging or participating in a hostile, intimidating, offensive or humiliating work environment through acts of sexual harassment; and
- Promptly report any instance of sexual harassment experienced or witnessed to the Internal Complaint Committee (ICC) constituted under this Policy, more particularly specified in section 6.9 herein, and cooperate with and abide by the complaint handling and inquiry procedures prescribed herein.

2. GENERAL CLAUSES

The terms appearing in this Policy shall have the meanings assigned to them in the Definitions section of this Policy. Any term used in this Policy but not specifically defined herein shall have the meaning ascribed to it under the Act and/or the Rules framed thereunder, as amended from time to time.

In the event of any inconsistency or conflict between the provisions of this Policy and the Act and/or the Rules framed thereunder, the provisions of the Act and the Rules shall prevail to the extent of such inconsistency.

This Policy shall be read in conjunction with SFL's Code of Conduct and other applicable internal policies and shall form an integral part of the terms and conditions of employment and engagement with SFL.

3. SCOPE/ COVERAGE

This Policy is applicable to all employees of SFL, including permanent, temporary, probationary, contractual, part-time, trainee, apprentice and interns, whether engaged directly or through an agency, and shall apply irrespective of seniority, designation or role.

This Policy shall also extend, to the extent applicable, to consultants, contractors, vendors, service providers, visitors, customers and any other third parties who interact with SFL or its employees in the course of work-related activities.

While this Policy is framed in accordance with the Act and the Rules framed thereunder, SFL recognises that unwelcome conduct of a sexual nature may be experienced by persons of any gender. Accordingly, the standards of conduct, preventive measures and internal disciplinary framework prescribed under this Policy shall apply, mutatis mutandis, to all persons covered herein, irrespective of gender, for the purpose of ensuring a safe, dignified and respectful workplace.

It is clarified that the statutory rights, remedies and procedures under the Act shall apply in accordance with the Act, and any complaint or grievance not covered under the statutory framework shall be addressed by SFL in accordance with its internal policies, service rules and applicable disciplinary mechanisms.

This Policy is not in derogation of any other legal rights available to an aggrieved employee or person under applicable laws.

The Policy takes cognisance of and is framed in accordance with the Act and the Rules framed thereunder, as amended from time to time, and shall be read consistently with applicable governance and disclosure requirements, including the Social and Governance principles under ESG frameworks relating to workplace dignity, non-discrimination and grievance redressal, and relevant SEBI guidelines, where applicable.

For the purposes of this Policy, sexual harassment is prohibited at the workplace as well as at any place visited by an employee or person covered under this Policy during the course of employment or in connection with work, including but not limited to branch offices, client locations, training programmes, official travel, transportation provided by SFL, work-related events, meetings, conferences and social or business gatherings linked to employment.

4. OBJECTIVE/ PURPOSE

- 4.1 To provide a safe, secure and inclusive work environment at SFL that is free from victimisation, discrimination and harassment of a sexual nature;

- 4.2 To issue a clear policy framework defining sexual harassment, and to prevent, prohibit and deter the occurrence of sexual harassment at the workplace;
- 4.3 To address issues relating to sexual harassment by establishing accessible, effective and time-bound informal and formal mechanisms for the reporting, redressal and resolution of complaints of sexual harassment;
- 4.4 To define the implications, disciplinary consequences and remedial actions arising from violations of this Policy, and to ensure adherence to this Policy in conjunction with the Satin Finserv Limited's Code of Conduct and other applicable internal policies.

5. DEFINITIONS

For the purposes of this Policy, unless the context otherwise requires, the following terms shall have the meanings assigned to them below:

- **“Act”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time.
- **“Aggrieved Individual”** means an employee of Satin Finserv Limited or a third party who alleges to have been subjected to any act of sexual harassment at the workplace or in connection with work for the purposes of statutory compliance, the term shall be interpreted in accordance with the Act.
- **“SFL” / “Company”** means Satin Finserv Limited and, where the context so requires, includes its subsidiaries, associate companies, branches and offices.
- **“Complainant”** means an Aggrieved Individual who makes a complaint of sexual harassment under this Policy and, in circumstances where the Aggrieved Individual is unable to make a complaint on account of physical or mental incapacity, death or any other valid reason, includes any person permitted to make a complaint on behalf of such Aggrieved Individual in accordance with the Act and the Rules.
- **“Employee”** means a person employed with SFL at a workplace for any work, whether on permanent, temporary, contractual, probationary, part-time, ad-hoc, daily wage or consultant basis, either directly or through an agent, whether for remuneration or not, and includes a co-worker, trainee, apprentice, intern or called by any other such name, whether the terms of employment are express or implied.
- **“Internal Complaints Committee”** means the committee constituted by SFL in accordance with the provisions of the Act for the prevention, prohibition and redressal of complaints of sexual harassment.
- **“Manager”** means any person responsible for the management, supervision or control of the workplace, including but not limited to the HR Manager, Circle / Region / Division / Corporate Office / Zonal Office Heads, and the head of any business, function or operational unit.
- **“Respondent”** means the person against whom a complaint of sexual harassment has been made under this Policy.

- **“Rules”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, as amended from time to time.
- **“Workplace”** shall have the meaning assigned to it under the Act and includes all locations connected with employment or work-related activities.

6. INTERNAL COMPLAINTS COMMITTEE (ICC)

- 6.1 In accordance with the provisions of the Act, SFL shall constitute an Internal Complaints Committee (“ICC”) for the purpose of receiving, inquiring into and redressing complaints of sexual harassment under this Policy. The ICC shall be constituted by SFL and shall consist of the following members:
- 6.2 A Presiding Officer, who shall be a senior woman employee of SFL or any group entity;
- 6.3 Not less than two members from amongst the employees of SFL, preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- 6.4 One external member from amongst non-governmental organisations or associations committed to the cause of women, or a person familiar with issues relating to sexual harassment.
- 6.5 At least one-half of the total members of the ICC shall be women.
- 6.6 The ICC shall be constituted at the corporate level and/or such other levels or locations as may be required in accordance with the Act, having regard to the number of employees and the operational structure of SFL.
- 6.7 The tenure of the members of Internal Complaints Committee (ICC) shall be prescribed under the Act and rules and shall not exceed a maximum of three (3) years (subject to re-appointment)from the date of their appointment unless the committee is reconstituted earlier in accordance with law.
- 6.8 The names and contact details of the members of the ICC shall be prominently displayed at conspicuous places at SFL workplaces and shall also be communicated to employees through appropriate internal communication channels.
- 6.9 The ICC shall function in an independent, unbiased and confidential manner, and shall conduct inquiries in accordance with the principles of natural justice, the provisions of the Act, the Rules and this Policy.
- 6.10 SFL shall provide all necessary assistance, infrastructure and support to the ICC for the effective discharge of its functions, including access to information, records, witnesses and logistical support.
- 6.11 No member of the ICC shall participate in any inquiry in which they have a direct or indirect interest, and such member shall recuse themselves from the proceedings in accordance with the principles of fairness and impartiality.
- 6.12 In accordance with Section 8 of this Policy and the provisions of the Act, SFL has constituted the following Internal Complaints Committee (ICC):

Name of Committee Member	Role	Role in ICC
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Ms. Aditi Singh	Chief Strategy Officer- SCNL	Presiding Officer
Mr. Arjun Bansal	Chief Financial Officer	Member
Ms. Meenu Dua	Head – Human Resource	Member
Ms. Arneet Kaur	External Member	Member

7. WHAT CONSTITUTES SEXUAL HARASSMENT

7.1 Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

- Physical contact and advances;
- A demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal, non-verbal or electronic conduct of a sexual nature.

7.2 Sexual harassment may occur regardless of gender, position or seniority, and may be committed by or against an employee, manager, colleague, customer, vendor, consultant or any third party connected with SFL in the course of work-related activities.

7.3 The following circumstances, among others, if occurring in relation to or in connection with any act or behavior of sexual harassment, may also constitute sexual harassment:

Quid Pro Quo Harassment

A form of sexual harassment in which submission to or rejection of sexual conduct is used as the basis for employment-related decisions. This may include, directly or indirectly:

- A promise of preferential treatment in employment;
- A threat of detrimental or adverse treatment in employment;
- A threat to present or future employment status, compensation, appraisal, promotion or work allocation.

Hostile Work Environment Harassment

Unwelcome conduct of a sexual nature that has the purpose or effect of interfering with an employee's work performance or creating an intimidating, hostile, offensive or humiliating work environment, including but not limited to:

- Creation of conditions that interfere with work or create an intimidating, hostile or offensive work environment;
- Humiliating, abusive or derogatory conduct likely to affect the dignity, health, safety or well-being of the Aggrieved Individual.
- Sexual harassment under this Policy may occur at the workplace or at any location connected with employment or work-related activities, including during official travel, training programmes, meetings, conferences, work-related social events, transportation provided by SFL, electronic communications or any other situation linked to professional duties.

- Determination of whether an act or behaviour constitutes sexual harassment shall be made by the Internal Complaints Committee based on the facts, circumstances, evidence and context of each case, in accordance with the provisions of the Act and the Rules.

8. PREVENTION OF SEXUAL HARASSMENT – PREVENTIVE MEASURES

- 8.1 SFL is committed to preventing sexual harassment at the workplace through awareness, sensitisation, training and prompt redressal of complaints in accordance with this Policy and the Act.
- 8.2 An Aggrieved Individual may, if they feel safe and comfortable to do so, communicate to the Respondent that such conduct is unwelcome and should cease immediately. It is clarified that the Aggrieved Individual is under no obligation to do so, and failure to directly confront the Respondent shall not prejudice the right to file a complaint under this Policy.
- 8.3 An Aggrieved Individual is encouraged, but not required, to maintain a record of incidents of sexual harassment, including details such as date, time, place, nature of the incident, and names of witnesses, if any. The absence of such records shall not, by itself, invalidate or weaken a complaint.
- 8.4 Any instance of sexual harassment, whether experienced or witnessed, should be reported at the earliest opportunity to the Internal Complaints Committee (ICC) constituted under this Policy.
- 8.5 Human Resources department shall take appropriate preventive measures, including periodic communication, display of this Policy, training programmes and awareness initiatives, to ensure that employees are informed of their rights, obligations and the mechanisms available for prevention and redressal of sexual harassment.

9. COMPLAINT, INQUIRY AND REDRESSAL PROCEDURE

Filing of Complaint

- An Aggrieved Individual may make a complaint of sexual harassment in writing to the Internal Complaints Committee (ICC) on POSH@satinfinserv.com within a period of three (3) months from the date of the incident and, in case of a series of incidents, within three (3) months from the date of the last incident.
- Where the ICC is satisfied that circumstances existed which prevented the Aggrieved Individual from filing a complaint within the aforesaid period, it may extend the time limit for filing the complaint by a further period of three (3) months, for reasons to be recorded in writing, in accordance with the Act.
- Where the Aggrieved Individual is unable to make a complaint on account of physical or mental incapacity, death or any other reason, a complaint may be made by any person authorised under the Act and the Rules.
- **Manner of Complaint**
- The complaint shall be submitted in writing and may be sent to the ICC through physical submission (to the Head-HR) or through such electronic means as may be notified by the Human Resources department from time to time.

- The ICC shall provide reasonable assistance to the Aggrieved Individual for the purpose of making the complaint in writing, where required.

Conciliation

- Before initiating an inquiry, the ICC may, at the written request of the Aggrieved Individual, take steps to settle the matter between the Aggrieved Individual and the Respondent through conciliation.
- No monetary settlement shall be made as a basis of conciliation.
- Where a settlement has been arrived at through conciliation, the ICC shall record the settlement and forward the same to the Human Resources department for implementation. No further inquiry shall be conducted in such cases, provided the terms of settlement are complied with.

Inquiry by the ICC

- Where conciliation is not requested or where conciliation has failed, the ICC shall proceed to conduct an inquiry into the complaint in accordance with the provisions of the Act, the Rules and the principles of natural justice.
- The ICC shall provide both the Aggrieved Individual and the Respondent a reasonable opportunity of being heard and of presenting evidence and witnesses.
- The inquiry shall be completed within a period of ninety (90) days from the date of receipt of the complaint.
- **Interim Relief:** During the pendency of the inquiry, the ICC may, at the written request of the Aggrieved Individual, recommend to the Human Resources department one or more of the following interim measures, as it may deem appropriate:
 - Transfer of the Aggrieved Individual or the Respondent to another workplace or role;
 - Grant of leave to the Aggrieved Individual for a period up to three (3) months, in addition to any leave otherwise entitled;
 - Any other relief considered appropriate to ensure a safe working environment.

Inquiry Report and Recommendations

- On completion of the inquiry, the ICC shall prepare a reasoned written report of its findings and submit the same to Board within ten (10) days of completion of the inquiry, for notice.
- Copies of the inquiry report shall be provided to the Aggrieved Individual and the Respondent.

Action by SFL

SFL shall act upon the recommendations of the ICC within sixty (60) days of receipt of the inquiry report, in accordance with the Act, the Rules, this Policy and applicable service rules.

Appeal

Any person aggrieved by the recommendations of the ICC or by the non-implementation of such recommendations may prefer an appeal to the appropriate authority in accordance with the provisions of the Act and applicable law.

10. ACTION ON COMPLETION OF INQUIRY

10.1 Findings of the ICC:

On completion of the inquiry, the Internal Complaints Committee (ICC) may arrive at one of the following findings and record the same in its written inquiry report:

- That the allegations of sexual harassment have not been proved; or
- That the allegations of sexual harassment have been proved; or
- That the complaint has been made maliciously or with knowledge that it is false, in accordance with the Act.

10.2 Complaint Not Proved

- Where the ICC concludes that the allegations against the Respondent have not been proved, it shall recommend that no action is required to be taken against the Respondent.
- Such conclusion shall not, by itself, attract any adverse action against the Aggrieved Individual or the Complainant.

10.3 Complaint Proved

Where the ICC concludes that the allegations of sexual harassment have been proved, it shall recommend to SFL appropriate action against the Respondent, which may include one or more of the following, in accordance with applicable service rules and employment terms:

- Written apology;
- Warning, reprimand or censure;
- Withholding of promotion, increment or benefits;
- Transfer or change in role or reporting structure;
- Suspension or termination of employment;
- Any other disciplinary action as may be deemed appropriate under applicable policies.
- The ICC may also recommend deduction from the salary or wages of the Respondent, such sum as it may consider appropriate, to be paid to the Aggrieved Individual as compensation, in accordance with the Act.
- While determining the quantum of compensation, the ICC shall have due regard to statutory guidelines, including the mental trauma, pain, suffering, loss of career opportunity, medical expenses and income of the Respondent.

10.4 Implementation of Recommendations

SFL shall act upon the recommendations of the ICC within the period prescribed under the Act and shall ensure due compliance with applicable service rules and principles of natural justice.

10.5 No Mandatory Deduction

It is clarified that any recommendation for deduction of salary or wages is not mandatory, and shall be made only where considered appropriate by the ICC in accordance with law.

11. THIRD PARTY HARASSMENT

11.1 Sexual harassment of an employee of SFL by any third party or outsider, including but not limited to customers, vendors, service providers, consultants, visitors or any other person not directly employed by SFL, shall be addressed in accordance with this Policy and applicable law.

11.2 Where sexual harassment occurs as a result of an act or omission by a third party or outsider in the course of, or in connection with, employment or work-related activities, the Aggrieved Individual may report such incident to the Internal Complaints Committee (ICC).

11.3 The ICC may conduct a preliminary assessment or inquiry into the complaint to the extent feasible and appropriate, and shall record its findings in writing.

11.4 Based on the findings of the ICC, SFL shall take appropriate corrective and preventive measures, which may include one or more of the following:

- Issuing warnings or advisories to the third party concerned;
 - Restricting or terminating the engagement, access or business relationship with the third party, where permissible;
 - Providing necessary support and assistance to the Aggrieved Individual, including facilitating filing of a complaint with appropriate authorities, where required;
 - Taking such other steps as may be necessary to prevent recurrence of such incidents and to ensure a safe working environment.
- Nothing in this section shall limit the right of the Aggrieved Individual to seek remedies available under applicable law against such third party or outsider.

12. FALSE OR MALICIOUS COMPLAINTS

12.1 Where the Internal Complaints Committee (ICC) arrives at a conclusion that the complaint has been made maliciously, or that the Aggrieved Individual or the Complainant has made the complaint knowing it to be false, or has produced any forged or misleading document, the ICC may recommend to SFL to take appropriate action against such person, in accordance with the applicable service rules, employment terms and the provisions of the Act.

12.2 Any action recommended under this section shall be taken only after due inquiry and in accordance with the principles of natural justice.

12.3 It is expressly clarified that the mere inability to substantiate a complaint or provide adequate proof shall not, by itself, attract action against the Aggrieved Individual or the Complainant.

12.4 The burden of establishing malice or knowledge of falsity shall rest with the ICC, and such finding shall be recorded with reasons in the inquiry report.

13. CONFIDENTIALITY

13.1 The contents of the complaint, the identity and addresses of the Aggrieved Individual, the Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee (ICC) and action taken by SFL under this Policy shall be treated as strictly confidential.

13.2 No information referred to in Section 13.1 shall be published, communicated or made known to the public, press or media in any manner, except where disclosure is required under the provisions of the Act or any other applicable law.

13.3 Any breach of confidentiality obligations by any person shall be dealt with in accordance with the provisions of the Act and applicable service rules of SFL.

14. REPORTING

The Internal Complaints Committee shall prepare and submit all reports required under the Act and the Rules made thereunder, including the annual report to the District Officer, Municipal Corporation of Gurgaon within the prescribed timelines. SFL shall ensure due compliance with such statutory reporting requirements and shall provide all necessary support to the Internal Complaints Committee for this purpose.

15. REVIEW OF POLICY

This Policy shall be reviewed periodically and at least once in a year, or earlier in the event of any change in applicable law, judicial interpretation or regulatory requirements.