

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Version 1.0

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I. POLICY:

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (herein after referred to as “Law”) is an act to provide protection against sexual harassment of women at workplace and for prevention and redressal of complaints of sexual harassment and for matters therewith or incidental thereto. This policy of Prisha Wealth Management Private Limited on prevention of sexual harassment at workplace is applicable from 10th January, 2024 .

II. COMMITMENT:

Prisha Wealth Management Private Limited [the Company] is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

III. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

- i. All offices or other premises where the Company's business is conducted.
- ii. All company-related activities performed at any other site away from the Company's premises.
- iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

IV. EFFECTIVE DATE AND APPLICABILITY:

This policy extends to all Employees of the Company and is deemed to be incorporated in the service conditions of all the employees with immediate effect.

An Employee means any person employed with the Company , including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites.

V. DEFINITION OF SEXUAL HARASSMENT:

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

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favors; or
- (iii) making sexually colored remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature



The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- (i) implied or explicit promise of preferential treatment in her employment; or
- (ii) implied or explicit threat of detrimental treatment in her employment; or
- (iii) implied or explicit threat about her present or future employment status; or
- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) humiliating treatment likely to affect her health or safety

VI. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

- All employees of the Company as defined above have a personal responsibility to ensure that their behavior is not contrary to this policy and are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

VII. COMPLAINT MECHANISM

If Company has fewer than 10 employees, an Internal Complaints Committee (ICC) is not mandatory. Instead, complaints will be directed to the Local Complaints Committee (LCC) set up by the district authorities as per the POSH Act.

VIII. COMPLAINT PROCEDURE

- Any employee who experiences sexual harassment should report the incident in writing to the Designated Officer, Ms. Priti Goel, [Officer Contact Information priti.goel@prishawealth.com]. If necessary, the complaint will be forwarded to the LCC for redressal. In case Ms. Priti Goel is unavailable, the complaint can also be directed to Ms. Nidhi Goyal, at [Contact Information nidhi.goyal@prishawealth.com].
- The complaint should be made within three months from the date of the incident.
- The complainant may request confidentiality during the process.

IX. INQUIRY PROCESS

- Upon receiving the complaint, the LCC will conduct an impartial inquiry in accordance with the POSH Act.
- Both parties will be given an opportunity to present their case.
- The inquiry will be completed within 90 days, and appropriate action will be taken based on the findings.

X. ACTIONS & CONSEQUENCES

If an employee is found guilty of sexual harassment, disciplinary action may include:

- A written apology
- Warning or reprimand
- Reduction in salary or withholding promotion
- Termination of employment
- Any other action deemed necessary by the LCC

XI. PROTECTION AGAINST RETALIATION

The Company ensures that complainants and witnesses are protected against victimization or retaliation. Any act of retaliation will be treated as misconduct.



XII. AWARENESS & TRAININGS

Anti-sexual harassment trainings will be conducted periodically for creating awareness amongst personnel. These trainings are meant to sensitize personnel regarding policy and related Act.

XIII. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

XIV. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XV. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee as defined above who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XVI. Policy Review & Amendments

This policy will be reviewed periodically to ensure compliance with legal updates and company requirements.

XVII. MISCELLANEOUS:



- A The management will provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- B The Management reserves the right to amend the Policy or any clauses as deemed fit.
- C The Policy is purely internal in nature and as such cognizance of any authority under any statute is always protected.

XVIII. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.



Review and Approval

Version	Reviewer	Approver
1.0	 Priti Goel Director	 Nidhi Goyal Director



PROCESS FLOW

