

Organisation: Ankur Fincon Management Private Limited

Policy Name: Prevention and Redressal of Sexual Harassment at workplace (POSH)

Approved by: Rema Subramanian, Director

Objective

At Ankur Fincon Management Private Limited, it is our desire to promote a healthy and congenial working environment irrespective of gender, caste, creed, religion or social class of the employee. We value every individual and are committed to protect the dignity and respect of every individual. We therefore have zero-tolerance for any act of sexual harassment and shall invite serious disciplinary action. This policy is meant to lay guidelines and sensitise the employees about what conduct constitutes sexual harassment, the ways and means we are adopting to prevent occurrence of any such event, and in the unfortunate chance of such an incident, to enable a fair mechanism for dealing with such conduct.

The policy is made under the overall ambit of the Ankur Fincon Management Private Limited Code of Conduct and The Sexual Harassment at The Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013

Scope

Ankur Fincon Management Private Limited's policy for POSH is applicable to:

- Every employee across the organization – payroll, non-payroll, associates, consultants, on training and temporary
- An alleged act of sexual harassment, whether the incident has occurred during or beyond office hours
- An alleged act of sexual harassment, whether sexual harassment has taken place within or outside the Ankur Fincon Management Private Limited premises.

Prevention on Sexual Harassment

No employee shall be subjected to sexual harassment at workplace. Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature which includes:

- Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any organization activity;
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- Conduct of such an act at work place or outside in relation to an employee, or vice versa during the course of employment; and
- Any unwelcome gesture by an employee having sexual overtones.

Internal Complaints Committee (ICC)

As per the law "The Sexual Harassment at The Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013" and in accordance with Supreme Court Guidelines, Ankur Fincon Management Private Limited has formed an Internal Complaints Committee (ICC) which will manage the process of enquiry and redressal of sexual harassment complaints.

Names of the members of the Internal Complaints Committee (ICC) with their contact details are mentioned below:

Name	Designation & Role	Email Id	Mobile Number
Ritu verma	Director	ritu@ankurcapital.com	9820683107
Deepak Bhatt	VP Finance	deepak@ankurcapital.com	7406118877
Krishnan Neelakantan	Director	krishnan@ankurcapital.com	9820187649
Keshab goswami	External consultant	hikeshab@gmail.com	9987055800

Complaint Mechanism

- Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “Internal Complaint Committee” (ICC) has been created for time-bound redressal of the complaint made by the aggrieved employee.
- No meeting of the ICC can be held without at least 3/5 members present including the external member.

Process To complaint of Sexual Harassment

- Any aggrieved employee may make, in writing, a complaint of sexual harassment at workplace to the ICC within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident at complaints@ankurcapital.com / letter to member of Internal Complaints Committee (ICC)/ contact via phone to any member of ICC.
- Provided that where such complaint cannot be made in writing, member of ICC shall render all reasonable assistance to the aggrieved employee for making the complaint in writing;
- Provided further that the ICC, as the case may be, may, for the reasons to be recorded in writing, extend the time limit, to not exceeding three months, if it is satisfied that the circumstance was such which prevented the aggrieved employee from filing a complaint within the said period.
- Where the aggrieved employee is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise, his/her legal heir or any other person, with consent of aggrieved employee, may make a complaint.

Conciliation

- a) At the request of the aggrieved employee, the ICC before initiating enquiry, take steps to settle the matter between the aggrieved employee and the respondent through conciliation provided that no monetary settlement shall be made as basis of conciliation
- b) Where a settlement is arrived, the ICC shall record the settlement and recommend to the Managing Director to take necessary action
- c) ICC shall provide the copies of settlement as recorded to the aggrieved employee and respondent
- d) Where a settlement is arrived, no further inquiry shall be conducted by the ICC

Inquiry into the Complaint

The ICC after acknowledging receipt of the complaint to the aggrieved employee within seven days of receipt of the complaint shall proceed with the inquiry as per the following:

- The ICC shall prepare and hand over the allegation to the respondent against whom complaint is made and give him/her an opportunity to submit a written explanation
- The aggrieved employee shall be provided with a copy of the written explanation submitted by the person against whom complaint is made
- If the aggrieved employee or respondent against whom complaint is made desires any witness/es to be called, they shall communicate in writing to ICC the names of witness/es whom they propose to call
- If the aggrieved employee desires to tender any documents by way of evidence before ICC, s/he shall share original copies of the same. Similarly, if the respondent against whom complaint is made desires to tender any documents in evidence before the ICC s/he shall share original copies of the same
- ICC shall call upon all witnesses mentioned by both the parties
- ICC shall provide every reasonable opportunity to the aggrieved employee and to the respondent against whom complaint is made, for putting forward and defending their respective case;
- ICC shall complete the "Inquiry" within reasonable period but not beyond ninety days and communicate its findings and recommendations for action to the Managing Director.
- The Managing Director will direct appropriate action in accordance with the recommendation proposed by the ICC, which could even lead to termination of services

Action during Pendency of Inquiry

During the pendency of an inquiry, on a written request made by the aggrieved employee, ICC, as the case may be, may recommend to the Managing Director to:

- Transfer the aggrieved employee or the respondent to any other office; or
- Grant special leave to the aggrieved employee up to a period of three months; or
- Grant such other relief to the aggrieved employee as may be prescribed.

Malicious Complaint

If the ICC concludes that the allegation made against the respondent are malicious or have been made even after the knowledge of it being false or has produced forged or misleading documents, it shall report the same to the Management and the Management is bound to act against the person involved in such malice.

Every complaint that is not successful is not malicious.

Prohibition of Publications or Making Known contents of Complaint and Inquiry Proceedings

- a) The contents of the complaint made, the identity and addresses of the aggrieved employee, respondent and witnesses, any information in relation to conciliation and inquiry proceedings, recommendations of ICC as the case may be, and the action taken by the Managing Director shall not be published, communicated or made known to public, press or media in any manner.
- b) Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this policy without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved employee and witnesses.