

POSH POLICY**AGRIM FINCAP PRIVATE LIMITED**

A Non-Banking Financial Company – Investment and Credit Company (NBFC-ICC), Non-Deposit Taking, Non-Systemically Important (ND-NSI)

Corporate Address: F-40, Sector-6, Noida, Uttar Pradesh– 201301

Registered Office Address: 276, First Floor Gagan Vihar, Shahdara, Delhi, 110051

PREAMBLE

Agrim Fincap Private Limited (“the Company”), is committed to providing a safe, respectful, inclusive, and dignified workplace for all employees, workers, consultants, trainees, visitors, and other persons associated with the Company.

Recognizing the importance of maintaining a workplace free from sexual harassment, discrimination, intimidation, and hostile conduct, the Company adopts this Policy in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, along with the rules framed thereunder, as amended from time to time.

The Company acknowledges that every individual has the right to work in an environment that protects their dignity, privacy, equality, and personal safety. Accordingly, this Policy sets out the framework for prevention, prohibition, and redressal of sexual harassment at the workplace and establishes a fair, confidential, and time-bound mechanism for handling complaints.

While this Policy covers the key aspects prescribed under the Act, in case of any ambiguity or clarification, reference shall be made to the Act, and the provisions of the Act shall prevail.

The Company, being a Non-Banking Financial Company (NBFC), is committed to providing equal employment opportunities and fostering a safe, secure, and inclusive work environment for all its employees. The Company strives to ensure that every individual is able to work with dignity, free from any form of discrimination, harassment, or bias, including sexual harassment.

The Company, as a responsible corporate entity, maintains a zero-tolerance approach towards any form of sexual harassment or discrimination and is committed to taking all necessary steps to prevent and address such conduct.

Through this Policy, the Company aims to ensure protection against sexual harassment, establish a fair and effective grievance redressal mechanism, and promote a work environment that upholds respect, dignity, and equality for all women employees.

SCOPE

This Policy applies to all allegations and complaints of sexual harassment made by a woman against any employee or associated person of the Company, whether such incidents occur within the Company's premises or in any place that falls within the definition of "workplace" under applicable law.

The Policy covers all work-related environments, including offices, branches, client locations, official travel, and virtual or remote work settings, where interactions arise out of or during the course of employment.

All complaints pertaining to sexual harassment shall be addressed in accordance with the provisions of the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*, and the rules framed thereunder.

DEFINITIONS

For the purpose of this Policy, the following terms shall have the meanings assigned to them below:

4.1 "Employee"

An "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.

4.2 "Employer"

"Employer" means:

(i) any person responsible for the management, supervision and control of the workplace. (ii) the person discharging contractual obligations with respect to his or her employees; (iii) in relation to a dwelling place or house, a person or a household who employs or benefits from the employment of domestic worker, irrespective of the number, time period or type of such worker employed, or the nature of the employment or activities performed by the domestic worker.

4.3 "Aggrieved Woman"

"Aggrieved Woman" means (i) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent; (ii) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

4.4 "Respondent"

"Respondent" means a person against whom a complaint of sexual harassment has been made by the aggrieved woman under this Policy.

4.5 "Workplace"

"Workplace" includes all premises and locations where the Company conducts its business, including but not limited to head office, branch offices, regional offices, and any other place where work-related activities are carried out.

It also includes:

- Any place visited by an employee arising out of or during the course of employment, including client locations, meetings, training programs, or official events
- Any location where work-related interactions take place, including virtual or digital environments
- Transportation provided by the Company for undertaking such journey

4.6 "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 favours; or (iii) making sexually coloured remarks; or (iv) showing pornography; or (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Internal Complaints Committee (ICC)

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

INTERNAL COMPLAINTS COMMITTEE (ICC) COMPOSITION

S. No.	Designation	Member Name	Email
1.	Presiding officer	Ms. Samridhi Khurana	samridhi.khurana@agrimfincap.com
2.	Internal member	Ms. Chetna	Chetna@agrimfincap.com
3.	Internal member	Mr. Mukul Shankhla	mukul@speedoloan.com
4.	External member	Mr. Utsav Sharma	sharma.utsav450@gmail.com

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

Powers of the Internal Complaints Committee (ICC)

For the purpose of conducting an inquiry under this Policy, the Internal Complaints Committee shall exercise the powers conferred upon it under Section 11(3) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as are vested in a civil court. In particular, the Committee shall have the following powers:

Summoning and Examination of Persons:

The IC shall have the power to summon any person whose presence it considers necessary for the purpose of the inquiry and require such person to appear before the IC and provide evidence or make a statement on oath.

Discovery and Production of Documents:

The IC shall have the power to require the parties, witnesses, employees or any other person concerned to produce such documents, records, electronic communications, information or other material as may be relevant to the inquiry.

Calling for Information and Evidence:

The IC may call for such information, records, explanations or other evidence from the complainant, respondent, witnesses, employees, departments or other relevant persons as it may consider necessary for the purpose of determining the complaint.

Examination of Witnesses:

The IC may identify, call and examine witnesses and consider their statements and other evidence relevant to the complaint, in accordance with the principles of natural justice.

Conduct of Inquiry:

The IC shall conduct the inquiry in accordance with the principles of natural justice and the applicable provisions of the POSH Act and the rules made thereunder. The IC may regulate its own procedure for the conduct of the inquiry, subject to the requirements of applicable law and this Policy.

Non-cooperation / Failure to Appear:

Where the complainant or respondent fails, without sufficient cause, to appear before the IC for three consecutive hearings, the IC may terminate the inquiry or proceed to decide the complaint ex parte, as applicable, provided that the concerned party has been given prior written notice of at least fifteen days before such termination or ex parte decision.

Assistance and Access to Records:

The IC may seek the assistance of the Company, its employees, departments or other appropriate persons and may access relevant records or information necessary for the effective conduct of the inquiry, subject to applicable confidentiality and data protection requirements.

Interim Measures:

During the pendency of an inquiry, the IC may recommend to the Employer such interim measures as are permissible under the POSH Act, including measures for the protection and well-being of the aggrieved woman, as may be appropriate in the circumstances.

Recommendations:

Upon completion of the inquiry, the IC shall make its findings and recommendations in accordance with the POSH Act and applicable rules and submit its report to the Employer within the prescribed period.

Tenure of the members of Internal Complaints Committee

The Presiding Officer and every Member of the Internal Complaints Committee shall hold office for a period not exceeding three years from the date of their nomination, unless removed earlier in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Any vacancy arising due to resignation, removal or cessation of employment shall be filled by the Company through a fresh nomination in accordance with the applicable provisions of law.

Essential requirements of a Complaint:

- a) Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the internal Complaints Committee 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. the Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
- b) Where the aggrieved woman is unable to make a complaint on account of her physical/mental incapacity, a complaint may be filed by her relative, friend, co-worker or any person who has knowledge of the incident or by any person as allowed in the Act/ Rules with the consent from aggrieved woman.
- c) A complaint must specify the details of the incident in clear language with full particulars.
- d) Date, time and place of incident must be clearly and unambiguously mentioned in the complaint.
- e) The complaint must disclose the acts committed by the Respondent in clear and unambiguous terms.
- f) If any specific words have been used or any gesture demonstrated by the Respondent that must be explained in detail.
- g) The complaint must disclose in whose presence the misconduct has been committed by the Respondent so that those persons could be called as witnesses to verify the alleged incident.

h) The complaint, if possible, should also mention about the material evidence that could substantiate the allegations to enable the Internal Committee to investigate into the same in an effective and efficient manner and reach to a just conclusion.

Filing of Complaint

Any woman employee who believes that she has been subjected to sexual harassment at the workplace may file a written complaint with the Internal Complaints Committee (ICC). The complaint may be submitted either in handwritten or typed form, duly signed by the complainant, or by e-mail to hr@agrimfincap.com, with a copy (CC) marked to the Presiding Officer and the anyone of the internal member of the POSH Committee.

Where the complainant is unable to submit the complaint in writing, the Presiding Officer or any member of the Internal Complaints Committee shall provide all reasonable assistance to record the complaint in writing, ensuring that the complainant's rights are fully protected throughout the process.

Conciliation

Before initiating an inquiry, the Internal Committee may, only upon the written request of the aggrieved woman, attempt to resolve the matter through conciliation. Participation shall be voluntary, and any settlement reached shall be recorded in writing and forwarded to the Employer for implementation. No monetary settlement shall be made as the basis of conciliation. Where the terms of settlement are not complied with, the Internal Committee may proceed with the inquiry in accordance with the POSH Act, 2013.

Inquiry Proceedings

Where conciliation is not sought or where no settlement is arrived at, the Internal Complaints Committee shall conduct an inquiry in accordance with the provisions of the Act and the applicable rules. Proceedings shall ordinarily be conducted in a private setting, preferably in the Company's designated conference room or such other suitable location as may ensure confidentiality, dignity and fairness to all concerned. The inquiry shall be conducted in camera, and both parties shall be afforded a reasonable opportunity to present their respective versions, evidence and witnesses. The Committee shall endeavour to complete the inquiry within the statutory period prescribed under the Act while adhering to the principles of natural justice.

Determination of Compensation

Where the Internal Complaints Committee concludes that the allegation of sexual harassment has been proved, it may recommend to the Employer the payment of compensation to the aggrieved woman by the respondent in accordance with Section 15 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. While determining the amount of compensation, the Internal Complaints Committee shall have regard to the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman, the loss of career opportunity due to the incident, medical expenses incurred for physical or psychiatric treatment, the income and

financial status of the respondent, and the feasibility of making such payment in lump sum or in instalments.

Duties of the Employer

The Employer shall ensure that every employee is provided with a safe, secure and dignified working environment free from sexual harassment. The Employer shall constitute and support the Internal Complaints Committee by providing all necessary facilities, information and administrative assistance required for conducting inquiries under the POSH Act, 2013. The Employer shall also display the details of the Internal Complaints Committee and the penal consequences of sexual harassment at conspicuous places, organise regular awareness and orientation programmes, assist the aggrieved woman in pursuing legal remedies where required, treat sexual harassment as misconduct under the applicable service rules, implement the recommendations of the Internal Complaints Committee within the prescribed timelines, and ensure compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

False or Malicious Complaints

Where the Internal Complaints Committee concludes, after conducting an inquiry, that the complaint has been made with malicious intent or that the aggrieved woman or any other person has knowingly made a false complaint or produced forged, false or misleading evidence, it may recommend appropriate action against such person in accordance with the applicable service rules or, where no such rules exist, in the manner prescribed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. However, the mere inability to substantiate a complaint or provide adequate evidence shall not, by itself, attract action under this provision or imply that the complaint was false or malicious.

Confidentiality:

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, findings of the Internal Committee and the action taken by management of Agrim Fincap Private Limited shall not be published, communicated, or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence, and will be investigated promptly in an impartial manner. For completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

Appeal

Any person aggrieved by the recommendations made under Section 13(2) or Section 13(3)(i) or Section 13(3)(ii), or under sub-section (1) or sub-section (2) of Section 14 or Section 17, or by the non-implementation of such recommendations, may prefer an appeal to the appropriate appellate authority in accordance with Section 18 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, or the applicable service rules, as the case may be.

Such appeal shall be filed within ninety (90) days from the date of the recommendations, order, or non-implementation, as applicable.

The recommendations of the Internal Complaints Committee (ICC) shall be implemented by the Employer in accordance with Section 13(4) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, unless modified, stayed, or set aside by the competent appellate authority. Pending any such appeal, and unless otherwise directed by the competent appellate authority, the recommendations and consequential actions shall be binding upon both the aggrieved person and the respondent (wrongdoer), and both parties shall comply with the same.

Policy Availability

The Policy will be available to all employees on <https://agrimfincap.com>.