

Prevention of Sexual Harassment (POSH) Policy

Version 2.0

Pursuant to the Sexual Harassment of Women at Workplace (Prevention,
Prohibition and Redressal) Act, 2013

Last approved by the Board on 15-Dec-2025



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1. Introduction

The objective of this prevention of sexual harassment policy (the "**Policy**") is to provide an effective redressal mechanism for complaints on sexual harassment at workplace and matters incidental thereto and to outline procedures for filing complaints, investigating sexual harassment claims and employing appropriate disciplinary measures in case of violations. Kaleidofin Capital Private Limited ("**Kaleidofin Capital**" or the "**Company**") is committed to providing a working environment free from all forms of discrimination and harassment, including sexual harassment.

All concerned should take cognizance of the fact that the Company strongly opposes harassment in any form including sexual harassment, and that such behavior against women is not only prohibited under applicable law in India as set out in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "**Act**") and rules framed thereunder being the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the "**Rules**") but also under the terms of employment. Commission of any act of sexual harassment shall result in strict disciplinary action as set out under this Policy or otherwise.

This Policy has been adopted and implemented by the Company and is deemed to be incorporated in the service conditions/rules of all the employees, wherever applicable. While the Policy covers all the key aspects of the Act, in the event of any conflict between the Policy and the Act, the Act shall prevail.

2. Scope

All stakeholders are eligible to raise an issue under the provisions of the policy. The stakeholders are employees (including interns), consultants, vendors, customers, and any other individual associated with the Company. This policy is not designed or intended to limit the Company's authority to discipline or take remedial action for workplace conduct which is unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

3. Definitions pertaining to this policy

- **Complainant:** Complainant means, in relation to a Workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- **Respondent:** Respondent means a person against whom the Complainant has made a complaint to the Sexual Harassment Internal Committee under this policy.
- **Sexual harassment:** Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: -
 - a) physical contact and advances;

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- b) demand or request for sexual favours;
 - c) sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;
 - d) showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
 - e) repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
 - f) giving gifts or leaving objects that are sexually suggestive;
 - g) eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
 - h) persistent watching, following, contacting of a person;
 - i) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- **Workplace:** workplace is defined as any place where the Complainant or Respondent is employed, works, or visits in connection with work, during the course of or arising out of employment.

4. Sexual Harassment Determinants

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

- implied or explicit promise of preferential treatment in her employment; or
- implied or explicit threat of detrimental treatment in her employment; or
- implied or explicit threat about her present or future employment status; or
- interfering with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety.

5. Sexual Harassment Internal Committee

To ensure a safe environment, a "**Sexual Harassment Internal Committee**" (hereafter referred to as SHIC) needs to be constituted at the Company. This committee will consist of at least four members and each Company office will display a notice in this respect. Any complaint of Sexual Harassment at the Workplace may be made in writing by the Complainant (or by his/her legal heir, in case of any incapacity of the Complainant), to any member of the Committee, within a period of 3 months from the date of the incident and in case of a series of incidents, within 3 months of the last incident complained against. The Committee may however permit relaxation in this regard if it is satisfied that the circumstances were such that the Complainant was prevented from filing the complaint within the stipulated period. The Company will also form a central core Internal Committee represented by the CEO, HR representative and two more employees as identified by CEO to manage Company SHIC.

6. Constitution of Committee

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The SHIC shall consist of a minimum of two women members. The Presiding Officer/ Chairperson of Company SHIC shall be a female senior management representative from the Company. Two other employees who are committed to the cause of women, or those who have social work experience or legal knowledge shall be nominated as members to the Committee. Another member shall be nominated from an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment. In conducting the inquiry, a minimum of 3 Members of the Company SHIC, including the Presiding Officer/ Chairperson, shall be present.

In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules 2013, the member appointed from non- government organizations shall be entitled to an allowance of minimum Rs. 200/- day for holding the proceedings of the Internal Committee and also the reimbursement of travel cost incurred in travelling by train in three tier air condition or air conditioned bus and auto rickshaw or taxi, or the actual amount spent by him/ her on travel, whichever is less.

Each member shall hold office for a specified period, not exceeding 3 years. Notwithstanding the foregoing, the Company may remove and replace any member from the Committee in case of misconduct, breach of confidentiality or abuse of position.

7. Procedure

On receipt of the complaint, the Committee may at the request of the Complainant attempt to settle the matter between the Complainant and the Respondent. However, such conciliation shall not involve any monetary compensation. Where a settlement has been arrived at pursuant to conciliation, the Committee shall record the settlement and forward the same to all the relevant parties to be acted upon including the Complainant and the Respondent. There shall be no further enquiry unless the Complainant informs the Committee that the Respondent has not complied with the terms of the settlement.

In all other instances, the Committee will initiate action to inquire into the complaint in accordance with the principle of natural justice. The Committee shall send a copy of the complaint to the Respondent within 7 working days of receipt of the complaint. Thereafter, the Respondent will file his reply with all supporting documents and names of witnesses within 10 working days. The Committee would then proceed by interviewing the Complainant, Respondent and any witnesses. They will also attempt to determine whether there are any individuals with any direct or indirect information regarding the complaint, interview such persons and gather all information relating to the complaint (including documentary or electronic information).

The Committee will ensure that the Complainant and the Respondent are called separately, so as to ensure freedom of expression and an atmosphere free of intimidation. The Committee shall have similar powers as vested in a civil court trying a similar suit under the Code of Civil Procedure, 1908. On completion of the enquiry, the committee shall submit a written report at the earliest, but not later than 90 (ninety) days from

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the date of filing of the complaint. Appropriate action will be recommended and taken based on the findings of the committee. Where both the parties are employees of the Company, a copy of the findings shall be made available to them.

8. Interim Measures during Pendency of the Enquiry

While the enquiry is pending, the Committee may, on the written request of the Complainant, make any appropriate recommendation as it deems fit, including the transfer of the Complainant or the Respondent to any other workplace or grant of leave to the Complainant up to a period of 3 months (in addition to the leave that the Complainant would otherwise be entitled to). The Committee shall then submit a report of its recommendation to the Company.

9. Findings and Action

On completion of the enquiry on the charges of sexual harassment, action will be decided based on the nature of the complaint and the findings of the committee. Based on the conclusions of the Committee, if an act of Sexual Harassment amounts to an offense under the provisions of the Indian Penal Code or any other law in force in the country, the Company will initiate other actions under the provisions of the law. This would include advising the aggrieved employee about her rights to initiate action in accordance with the law and providing the necessary assistance to file the complaint.

If the complaint against the Respondent has been proven during the enquiry, the Committee may recommend action against the Respondent, treating Sexual Harassment as misconduct. This may lead to dismissal or a warning not to repeat such action and could include any reasonable course of conduct to redress any loss or damage suffered by the Complainant as a result of the harassment. The defendant may also be asked to pay compensation to the Complainant, or give a written apology, with a clear understanding that no retaliatory steps will be taken by the defendant against the Complainant. While determining the compensation amount to be paid and other operative details regarding compensation, the Committee shall keep in mind various factors like loss of career opportunity for the Complainant due to this incident, medical expenses incurred for physical or psychiatric treatment, mental trauma and emotional distress, income and financial status of the Respondent etc.

Any other punishment ranging from a warning or censure to suspension, reduction in grades, or dismissal / termination of service may also be imposed, depending on the gravity of the act. The guidelines for this will be as per the Act.

If the Committee finds that the allegation of Sexual Harassment has not been proved, then it shall make a recommendation that no action is required to be taken in the matter. In case the Committee arrives at a conclusion that the Complainant's allegation is malicious or has been made with the knowledge that it is false; or that the Complainant or any witness has given false evidence /produced a forged or misleading

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document during the enquiry, then the Committee shall recommend that action be taken against such person(s). The inability to substantiate a complaint or provide adequate proof, however, may not always attract action against the Complainant.

10. Confidentiality of complaint and Proceedings

The contents of the complaint, identity and addresses of all the parties and witnesses involved, and all information relating to the enquiry, conciliation and recommendations shall be kept confidential at all times. However, information regarding the justice secured to any Complainant may be disseminated if so required without disclosing the identity and other particulars that may lead to identification of the Complainant. Any breach of this confidentiality provision by any person shall be deemed to be misconduct and dealt with accordingly.

11. Failure to take an action on a complaint

Where a complaint of sexual harassment is made to a reporting manager or a member of the Internal Committee, but no action is initiated, this neglect may be deemed as misconduct and action, as appropriate may be initiated against the manager concerned for neglect or compromising the working environment of the organization.

12. Annual Reporting of Complaints

The Committee shall submit a report for each calendar year to the District Officer appointed under the Act and the Company, specifying the number of complaints filed and their disposal.

13. Workplace Etiquette Regarding Professional Relationships

Employees should maintain a professional decorum in the workplace. Any personal relationship between employees in the same team, especially in a reporting relationship, is strongly discouraged.

14. Communication of Policy

The Company is committed to providing a safe working environment for all its employees. Workshops and sensitization programs shall be conducted at regular intervals and all employees are expected to participate in the same. This policy should be communicated to employees during the induction and an excerpt of this policy should be handed over, any amendments in the policy will be shared via email. Constant reminders on the policy will be sent to all the employees via email every month by the designated representative for this matter.

Employees are also encouraged to bring to the notice of their reporting managers/ senior management any

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breach in safety or possibility of negative impact on the working space, safety and security of the working environment. An aggrieved employee should bring incident(s) to the notice of the Internal Committee in a timely manner and be assured that the Company and the Sexual Harassment Internal Committee instituted by it will maintain confidentiality and look at redressal mechanisms at the earliest.

15. Timelines for Enquiry

The committee to meet – Study complaints and determine the next course of action	Within 3 working days from the receipt of the complaint
Initiation of enquiry proceedings	Within 7 working days from the date of deciding that an enquiry is warranted
Conclusion of Enquiry	Within a month from the date of receiving the complaint, in exceptional circumstances a maximum of 90 days as per the Act
Preparation of report and presentation to management	Within 7 working days from the date of conclusion of an enquiry

16. Complaint Procedure

All Company offices will have notices regarding Sexual Harassment displayed for our employees. Aggrieved employees are requested to either email or send a written communication to any/ all of the listed SHIC. Aggrieved employees are encouraged to use the format in Annexure 1 to send the written communication. In the case of an email communication, aggrieved employee is requested to mention SHIC in the subject line. If the aggrieved employee is unable to make a complaint on account of any physical or mental incapacity, the complaint may be filed by a friend, relative, co-worker, or any other person who has knowledge of the incident (with written consent of the aggrieved employee).

17. Nodal Officer

The Company has appointed a designated nodal officer who regularly updates details of the Company SHIC's on the SHe-BOX portal and ensures complaints are addressed in a timely manner. Employees may contact the nodal officer to address any queries or concerns they may have in relation to the Act or the SHe-BOX portal.

Name: Sindhuja A M

Designation: Company Secretary

Email: sindhuja.am@kaleidofincapital.com

Contact: +91 9884475853

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Annexure 1 - Complaint Form – Sexual Harassment

The Company is committed to providing a fair and safe work environment for its employees. Any employee found violating our Code of Conduct is taken as a serious matter and we are committed in making a full enquiry into the same in a confidential and fair manner. While registering a complaint using this form, we request employee to be as specific as possible in discussing the incident(s) which in turn will assist the investigators in the fact-gathering process. You are encouraged to attach additional materials, which may assist in the investigation process. Request you to sign this form in order to make it an official complaint. On receipt of your complaint, the Sexual Harassment Internal Complaints Committee (SHIC) will review it and initiate investigation. To investigate your complaint, it will be necessary to interview you, the alleged offender(s), and any witnesses with knowledge of the allegations or defence. Please be assured that the investigation process will be kept confidential.

Stakeholder Name: _____	Address: _____
Location: _____	Contact Number: _____
I am Employee/ Consultant/ Vendor/ Customer/ Other(s) _____	
My complaint is against _____	
Date of alleged incident	: _____
Place of alleged incident	: _____
Nature of alleged harassment	: _____

- Describe in detail the specific incident(s) that is the basis of the alleged harassment mentioning names dates and places (if applicable). Please feel free to use additional paper if needed.

-
- List and describe all evidence pertaining to your complaint

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- List and identify all witnesses if any to the incident(s) or persons who have personal knowledge of information pertaining to your complaint.

-
- Have you previously reported or otherwise complained about this or related acts of harassment to any other person within the Company? If so, please provide us with the details of the earlier complaint.
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I certify that to the best of my knowledge the information that I have provided is accurate and the events and circumstances are as I have described them. I understand that the nature of this complaint, correspondence, and all discussions conducted in the course of investigation of the information contained in this complaint are confidential to the extent permitted by existing law, rules & regulations. I agree to abide by these guidelines.

Signature: _____ Date: _____

Prevention of Sexual Harassment (POSH) Policy V2.0**Annexure 2 -Company Notice Board communication****Sexual Harassment Policy & Internal Committee**

Kaleidofin Capital is an equal opportunities employer and it is the objective of the Company to provide a free and safe working environment for all its employees, especially women. The Sexual Harassment Policy has been framed for the prevention and the redressal of any sexual harassment in the Company workplace in keeping with the principles of equality, freedom, life and liberty as enshrined in the Constitution of India.

All stakeholders of the Company are eligible to raise an issue under the provisions of the policy. The stakeholders of the Company who can raise a complaint are employees including trainees, consultants, vendors, customers and any other individual who is associated with the Company.

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

- a) physical contact and advances;
- b) demand or request for sexual favours;
- c) sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;
- d) showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
- e) repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- f) giving gifts or leaving objects that are sexually suggestive;
- g) eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- h) persistent watching, following, contacting of a person;
- i) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

In accordance with the Act, Kaleidofin Capital has constituted a four-member committee hereinafter referred to as "Sexual Harassment Internal Committee" (SHIC) with the following team members:

SHIC for Kaleidofin Capital Chennai Office

Sl. No	Name	Email ID	Designation in the Committee
1	Ms. Sucharita Mukherjee	sucharita@kaleidofin.com	Presiding Officer
2	Ms. Kaavya Shanmugam	kaavya.shanmugam@kaleidofincapital.com	Internal Committee member
3	Mr. Puneet Gupta	puneet@kaleidofincapital.com	Internal Committee member

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4	Ms. Madhuri Menon	amayaconsult@gmail.com	External Committee member
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SHIC for Kaleidofin Capital Bangalore Office

Sl. No	Name	Email ID	Designation in the Committee
1	Ms. Sucharita Mukherjee	sucharita@kaleidofin.com	Presiding Officer
2	Ms. Kaavya Shanmugam	kaavya.shanmugam@kaleidofincapital.com	Internal Committee member
3	Mr. Puneet Gupta	puneet@kaleidofincapital.com	Internal Committee member
4	Ms. Madhuri Menon	amayaconsult@gmail.com	External Committee member

Any stakeholder may lodge a complaint of sexual harassment. Third party complaints and witness complaints will also be entertained. Complaints can be lodged directly with any member of the SHIC, or through peers, superiors, etc. If the complaint is made through any such channel other than SHIC, the person to whom the complaint is made shall be bound to bring it to the notice of SHIC within two working days of its receipt. Any person aggrieved shall prefer a complaint at the earliest point of time and in any case within 15 days from the date of occurrence of the alleged incident.

For more details, please get in touch with any member in the SHIC.

