



KFIN TECHNOLOGIES LIMITED

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE



Prevention of Sexual Harassment at Workplace

Document Revision History

Version	Date of Release / Revision	Prepared / Revised By	Reviewed & Approved By		Reasons for revisions
			Name	Date	
1.0	18 th Mar 2019	HR Team	HR Head	15 th Mar 2019	Initial version
1.1	30 th Oct 2020	HR Team	HR Head	29 th Oct 2020	Change in the company name, Composition of IC, External member, email & definition presiding officer, internal committee, Duties of IC members & KFINTECH, Reporting process to Audit Committee
1.1	19 th Nov 2021	HR Team	HR Head	18 th Nov 2021	Reviewed and no changes
1.2	11 th Feb 2022	HR Team	HR Head	10 th Feb 2022	Changes made in the committee
2.0	11 th Apr 2022	HR Team	HR Head	8 th Apr 2022	"KFin Technologies Private Limited" has been replaced with "KFin Technologies Limited (Previously known as KFin Technologies Private Limited)" and "KFPL", "KCPL" is replaced with "KFintech"
3.0	1 st May 2023	HR Team			Changes made in the committee
3.1	June 28, 2023	HR Team	Reviewed by- Chief People Officer Approved by- Mr. Sreekanth Nadella	June 28, 2023	Re-constitution of POSH Committee

* Amended on June 28, 2023 vide the power delegated by the Board of Directors to the Managing Director & CEO.

Prevention of Sexual Harassment at Workplace

Contents

1.	Executive Summary.....	4
2.	Objective of the PoSH Policy.....	4
3.	Definitions.....	4
4.	Applicability & Scope	6
5.	Internal Committee:.....	6
6.	Duties of KFINTECH.....	7
7.	Duties of the IC.....	8
8.	Registration of Complaint.....	8
9.	Service of Notice.....	9
10.	Resignation of Employment during the course of Inquiry	9
11.	Conciliation.....	9
12.	Inquiry conducted by the IC.....	10
13.	Inquiry Report	10
14.	Disciplinary Action.....	11
15.	Victimization or Retaliation	10
16.	Confidentiality:.....	11
17.	False or Malicious Complaint and false evidence:	12
18.	Appeal.....	12
19.	Annual Report	12
20.	Awareness	12
21.	Reporting.....	13
22.	Schedules	14

Prevention of Sexual Harassment at Workplace

1. Executive Summary:

- 1.1 KFin Technologies Limited ('**KFINTECH**', "Company") is an equal employment opportunity employer. It is committed to ensure a safe, secure and congenial work environment for all employees, and has zero-tolerance to any incident of sexual harassment in the workplace in any manner whatsoever. KFINTECH is committed to fostering an environment free from fear and threat of reprisals, prejudice and bias in any manner whatsoever.
- 1.2 Accordingly, KFINTECH has framed this Policy for Prevention of Sexual Harassment ('**PoSH Policy**') in accordance with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" (hereinafter referred to as "**the Act**") and the Rules framed thereunder as well as KFINTECH's Code of Conduct and other policies respecting diversity and equality in respect of hiring, promotions, conditions of service, et cetera.

2. Objective of the PoSH Policy:

- 2.1 KFINTECH believes that all employees should, (a) have the opportunity to work in an environment free from sexual harassment, (b) complement each other as equals, and (c) have the right to be treated with utmost respect and dignity.
- 2.2 The purpose of this PoSH policy is to (i) ensure a safe working environment free from sexual harassment, in which persons belonging to all genders work and complement each other as equals, (ii) prevent sexual harassment at the Workplace, (iii) detail a mechanism to raise concerns or issues with respect to any instance of sexual harassment at the Workplace; and (iv) provide an appropriate redressal mechanism for grievances raised on sexual harassment.
- 2.3 Sexual harassment at the Workplace is a grave offence which would be treated as '**Misconduct**' under "**The KFINTECH Code of Conduct & Terms of Employment**" and shall result in disciplinary action as mandated by relevant KFINTECH policies, terms of employment and applicable laws.

3. Definitions:

- 3.1 **Sexual Harassment** includes any one or more of the following unwelcome acts or behavior whether directly or by implication, namely,
 - a) Physical contact and advances including touching, deliberately brushing against another person, blocking someone's movements, or assault; or
 - b) Demand or request for sexual favors including inappropriate or unwelcome flirtations, unsolicited sexual advances or proposals; or
 - c) Making sexually colored remarks including sexually explicit jokes, repeated sexual suggestions, involving sexual overtones, phone calls, emails, derogatory insults, messages, letters, or any other form of digital communication, etc; or
 - d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures; or
 - e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If any of the following circumstances occur or are present in relation to or connected with any act or behaviour of sexual harassment, the same may amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in employment; or
- b) Implied or explicit threat of detrimental treatment; or
- c) Implied or explicit threat about present or future employment status; or
- d) Interference with work or creating an intimidating or offensive or hostile work environment; or
- e) Humiliating treatment likely to affect health or safety.

Note : Sexual harassment transcends gender boundaries and can occur between any genders—male to female, female to male, male to male, female to female, or involving transgender individuals and people of diverse sexual orientations or gender identities (LGBTQA+). It is crucial for everyone to use sound judgment to prevent actions that others might interpret

Prevention of Sexual Harassment at Workplace

as Sexual Harassment In all instances, the key factor is not the intention of the harasser, but rather the impact on the individual experiencing such behavior matter.

3.2 **Aggrieved Person** means any person, of any age, whether employed with KFINTECH or not, who alleges to have been subjected to any act of sexual harassment by the Respondent within the Workplace.

3.3 **Complainant** means any Employee of KFINTECH or an Aggrieved Person who alleges to have been subjected to any act of sexual harassment by the Respondent within the Workplace.

My suggested definition - A Complainant is any Aggrieved Person filing a complaint alleging Sexual Harassment under this Policy (and / or any other person filing a complaint alleging Sexual Harassment under this Policy on behalf of the Aggrieved Person in the circumstances mentioned in Section 8 of this Policy).

3.4 **Employee** means a person employed at KFINTECH 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 KFINTECH, 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.

3.5 **Workplace:** Each of the following shall individually be considered as "Workplace" for the purpose of this PoSH Policy:

- a) Corporate office at Hyderabad setup by KFINTECH for the purposes of running the activities of corporate functions (the "**Corporate Establishment**");
- b) Regional and Branch Office(s) (including any other business location from where KFINTECH Employees operate) set up by KFINTECH (the "**Regional and Branch Establishments**")
- c) Workplace shall also include any place visited by the Employee arising out of or during the course of employment, including transportation provided or hired by KFINTECH for undertaking such journey, or on offsite or during business functions, events, activities of the KFINTECH or KFINTECH guest houses or accommodation and shall also include any hotel or restaurant if used for any purpose connected with or relating to business of the KFINTECH.
- d) KFINTECH may, at its discretion, and if the facts and circumstances so warrant, also take cognizance of incidents occurring at places other than Workplace as defined above, like functions and events of personal nature organized by one Employee and attended by others or jointly organized by them, et cetera
- e) Workplace shall also include virtual or remote working environments, including work-from-home arrangements, digital communication platforms, video conferencing tools, collaboration systems, and any electronic medium used for work-related interactions.

3.6 **Employer** shall have the same meaning as defined under the Act.

3.7 **Respondent** means a person against whom the the complaint of sexual harassment has been made under this Policy.

3.8 **Internal Committee** or **IC** means the Internal Committee constituted by the Company as per the Provisions and for the purposes outlined in the Act.

3.9 **PoSH Core Committee:** Refers to an internal administrative committee constituted at the corporate office of KFINTECH to oversee and monitor implementation of the PoSH Policy across all company locations, facilitate coordination among Internal Committees, and drive awareness, training, and compliance initiatives.

3.10 **Presiding Officer** or **PO** means the Presiding Officer of the IC nominated under sub section (2) of Section 4 of the Act.

Prevention of Sexual Harassment at Workplace

4. Applicability & Scope:

- 4.1 This Policy shall apply to all persons at the Workplace, irrespective of employment status, including Employees, any Aggrieved Person, and any individual such as consultants, vendors, clients, interns, contract workers, or others interacting with the Company in connection with its business or operations.
- 4.2 In jurisdictions outside India, additional local country laws shall take precedence over this Policy in the event of conflict with this Policy
- 4.3 The PoSH Policy shall come into effect in instances where the incident occurs at a KFINTECH Workplace.
- 4.4 The Chief People Officer is appointed as the person responsible for the overall administration and implementation of this PoSH Policy.
- 4.5 This Policy aligns with requirements of the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 as amended in 2016 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (collectively the "Act"). While the Act primarily provides protection to women, the Company is committed to maintaining a gender-neutral workplace. Accordingly, this Policy extends protection to persons of all genders. Complaints by women shall be addressed strictly in accordance with the provisions of the Act, and complaints by other genders shall be addressed in accordance with this Policy and applicable internal procedures.
- 4.6 The Company may operate from multiple locations. The list of workplaces and Internal Committee(s) shall be maintained on internal systems and may be updated from time to time without requiring amendment to this Policy.
For offices employing fewer than ten employees, or where constitution of a separate Internal Committee is not feasible, complaints shall be addressed by an Internal Committee constituted at a nearby location and designated by the Company for such purpose, ensuring accessibility and compliance with Section 4 of the PoSH Act, 2013.

5. Internal Committee:

- 5.1 KFINTECH shall constitute Internal Committees ("IC"), in accordance with the Act
- 5.2 The IC shall comprise a minimum of:
 - a) A **Presiding Officer** who shall be a woman employed at a senior level at the Workplace from amongst the Employees or nominated from other offices/ other Workplace(s) of KFINTECH, as provided in the Act.
 - b) Not less than **two members** from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
 - c) **One member** from amongst **non-governmental organizations or associations** committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- 5.3 The updated list of IC Members is furnished in the **Schedule III** and also published in the office premises.
- 5.4 The IC may also co-opt additional members from other offices of KFINTECH, if required, provided that at least one half of the total members so nominated shall be women.
- 5.5 The order constituting IC for KFINTECH and penal consequences of sexual harassment are put up on HR Portal / intranet of KFINTECH along with other HR Policies and Guidelines.
- 5.6 The chairperson or any member of the IC cannot hold office for a period exceeding 3 (three) years from the date of their nomination. Changes in the constitution of the IC whenever necessary shall be made as expeditiously as possible. A member can be nominated again.
- 5.7 In case a member of the IC dies or ceases to be engaged with KFINTECH during the period of nomination period, then KFINTECH will appoint an alternate member to the IC.

Prevention of Sexual Harassment at Workplace

- 5.8 Any member of the IC shall be removed from the IC if:
- a) he/she makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the contents of a complaint, the identity and addresses of the Complainant, Respondent and witnesses, details of the conciliation and inquiry proceedings, recommendations of the IC, or the action taken against the Respondent. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or
 - b) he/she has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her; or
 - c) he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
 - d) he/she has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.
- 5.9 The composition of the Internal Committee, including names and contact details of members, shall be set out in a Schedule III / administrative record maintained with this Policy and published through the Company's intranet, HR portal, workplace notices, or other official communication channels.

The same may be updated from time to time by the HR Department with the approval of the Chief People Officer, without requiring amendment to the Policy itself, provided that the composition at all times remains compliant with Section 4 of the PoSH Act, 2013.

6. Duties of KFINTECH

- 6.1 It will provide safe working environment at the Workplace.
- It will display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassment and constitution of the IC.
- It will organize workshops, awareness and orientation programs at regular intervals for sensitizing the Employees and the members of the IC with the provisions of the Act and this PoSH Policy.
- 6.2 It will provide necessary facilities, assistance and information to the IC for dealing with the complaints and conducting the inquiries thereof.
- 6.3 It will assist in securing attendance of the Respondent and witnesses before an IC.
- 6.4 It will provide assistance to the Aggrieved Person if he/she chooses to file a complaint in relation to the alleged Sexual Harassment under the Bharatiya Nyaya Sanhita, 2023 (earlier under Indian Penal Code, 1860 or any other applicable law for the time being in force).
- 6.5 It will cause to initiate action, under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force, against the perpetrator, or if the Aggrieved Person so desires, where the perpetrator is not an Employee, in the workplace at which the incident of Sexual Harassment took place.
- 6.6 It will treat Sexual Harassment as gross misconduct under the terms of employment and initiate action based on the recommendations of the IC.
- 6.7 It will monitor the timely submission of the reports by the IC.

Prevention of Sexual Harassment at Workplace

6.8 It includes the number of cases filed and disposed, if any, in the annual report of the Company, as per Section 22 of the PoSH Act.

6.9 The Company shall ensure that employees across all locations, including remote and smaller offices, have access to PoSH information, complaint procedures, and relevant contact details through centralized or digital platforms.

7. Duties of the IC

7.1 To conduct inquiry and provide redressal of complaints relating to sexual harassment in a fair and expeditious manner.

7.2 To recommend an appropriate psychological, emotional and any other necessary support (counselling, security and other assistance) for the Aggrieved Person, if necessary.

7.3 To maintain documents, minutes of meetings and discussions held by the IC with the Aggrieved Person, Respondent, witnesses, etc. during the course of the redressal proceedings.

7.4 To ensure strict confidentiality of the contents of the complaint, identity of persons involved and of the redressal proceedings.

7.5 To ensure protection of the Aggrieved Person against discrimination/ victimization/ retaliation and recommend appropriate action in case of occurrence thereof.

7.6 To maintain files with all the information, documents, etc. relating to complaints received and other document as per the Act.

7.7 To meet periodically to review the measures taken by the Company for awareness on prevention of sexual harassment or when the complaint is registered.

7.8 To prepare an annual report at the end of the calendar year and submit such report to the Employer and to the concerned officer under the Act.

8. Registration of Complaint:

8.1 Any Employee or Aggrieved Person may file a written complaint of sexual harassment at the workplace to the IC. It shall equally be responsibility of all managers to notify a member of the IC of an incident of sexual harassment that he/she is either witness or is brought to his/her notice by the Employee or Aggrieved Person. The IC shall render all reasonable assistance to the person for making the complaint in writing, as necessary.

8.2 All complaints relating to sexual harassment at Workplace shall be made within a period of 3 (three) months from the date of incident. In case of a series of incidents, the complaint shall be made within a period of 3 (three) months from the date of the last incident. The complaint form has been mentioned in **Schedule I**.

8.3 The IC in its own discretion and for reasons to be recorded in writing, may extend the time limit for the making the complaint by a period not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Employee or Aggrieved Person from filing a complaint within the said period of 3 (three) months.

8.4 The complaint needs to be made in writing by the Aggrieved Person. Where the Aggrieved Person is unable to make a complaint on account of his/her physical incapacity, the complaint can be filed by:

- a) His/her legal heir
- b) His/her relative or friend
- c) His/her co-worker
- d) an officer of National Commission for Women or State Women's Commission
- e) any person who has the knowledge of the incident, with written consent of the Aggrieved Person.

8.5 Where the Aggrieved Person is unable to make a complaint on account of his/her mental incapacity, the complaint can be filed by –

Prevention of Sexual Harassment at Workplace

- a) His/her legal heir; or
- b) His/her relative or friend; or
- c) a special educator; or
- d) qualified psychiatrist or psychologist; or
- e) the guardian or authority under whose care she is receiving treatment or care; or
- f) any person who has the knowledge of the incident jointly with her relative or friend or special educator or qualified psychiatrist or psychologist; or the guardian or authority under whose care he/she is receiving treatment or care.

If the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved Person's written consent.

8.6 If any Employee/Third Party is sexually harassed by any external party who is not an employee of the Company, either at the workplace or in that external party's premises, then IC shall contact either the POSH Committee or equivalent of that external party and/or the Police (as the case maybe), on the written complaint of such employee/Third Party to the IC of the Company and address the matter to satisfactory closure. Alternatively, employee/Third Party may choose to reach out directly to POSH Committee or equivalent of that external party and/or Police (as the case may be) and the Company will offer assistance on written request by employee/Third Party.

8.7 An indicative draft complaint format is provided in Schedule I to guide employees in filing complaints. Use of the format is not mandatory but recommended for clarity and completeness.

9. Service of Notice:

9.1 Upon receiving the Complaint under this PoSH Policy, any Notice issued by IC to the Respondent, Complainant or Aggrieved Person and the witness(s) shall be served by, (a) official email, (b) personal email to the email ID available on HR Portal, (c) Registered Post Acknowledgement Due and/or Speed Post Acknowledgement Due.

9.2 The Proof of Delivery of the aforementioned modes shall be deemed to be sufficient in terms of service of Notice.

10. Resignation of Employment during the course of Inquiry:

10.1 During the pendency of the Inquiry proceedings under this PoSH Policy, the Respondent, Complainant or Aggrieved Person and the witness(s) to the extent applicable, shall not be permitted to resign without the prior permission of the IC.

10.2 In case any Respondent, Complainant or Aggrieved Person and the witness(s) are found to be absconding during the process of Inquiry, the IC shall take appropriate measures and action under the Act, KFINTECH Code of Conduct and the HR Policy.

11. Conciliation

11.1 Prior to initiating an inquiry, the IC may, only at the written request of the Aggrieved Person, take steps to settle the matter between the Aggrieved Person and the Respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation.

11.2 In case a settlement has been arrived at, the IC shall record the settlement so arrived in writing and forward the same to the Employer for record and action, if applicable as specified in the recommendation of the IC.

11.3 The IC will provide copies of the settlement as recorded to the Aggrieved Person and the Respondent.

11.4 Upon a conciliation being reached, the IC would not be required to conduct any further inquiry.

Prevention of Sexual Harassment at Workplace

12. Inquiry conducted by the IC:

- 12.1 The Complainant or Aggrieved Person shall submit the complaint to IC along with the supporting documents and the names and addresses of the witnesses either in writing or by email addressed to posh@kfintech.com, or through grievance redressal portal www.convercent.com. The Complaint shall contain all the relevant material and details concerning the alleged sexual harassment including the name(s) of the Respondent(s) as per the format given in Schedule I. The statutory timeline for the Inquiry proceeding has been outlined in Schedule II.
- 12.2 Within a period of 7 (seven) working days from the receipt of the Complaint, IC shall send one copy of the complaint to the Respondent. The Respondent shall file his/her reply to the Complaint along with his/her list of documents, names and addresses of witnesses within a period of 10 (ten) working days from the date of receipt of Complaint.
- 12.3 IC shall take immediate necessary action to cause an inquiry to be made into the Complaint in accordance with the principles of natural justice. Minimum of 3 (three) members of the IC including the Presiding Officer shall be present during the Inquiry. Both the Complainant or Aggrieved Person and the Respondent will be given an equal opportunity to be heard. No Advocate or Legal Practitioner shall be permitted to represent the Complainant or the Respondent. A copy of the findings of IC shall be made available to both the parties enabling them to make representation against the findings before IC.
- 12.4 IC shall in relation to the Complaints filed by an Complainant or Aggrieved Person have the powers of a civil court as provided under the Code of Civil Procedure, 1908 in respect of the following matters:
- Summoning and enforcing the attendance of any person and examining him/her on oath.
 - Requiring the discovery and production of documents.
 - Any other matter.
- 12.5 IC shall have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the complaint, after giving advance notice of 15 (fifteen) days in writing, if the Complainant or Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by the Presiding Officer. IC will make every effort to complete the inquiry within a period of 90 (ninety) days of receipt of complaint by IC.
- 12.6 **Interim Measures:** IC during the pendency of the inquiry, on the written request of the Complainant, recommend to the employer (i) to transfer the Complainant or the Respondent to any other Workplace; (ii) put the Respondent under suspension, or (iii) grant leave to the Complainant up to a period of 3 (three) months; or (iv) restrain the Respondent from reporting on the work performance of the Complainant or writing his/ her confidential report and assign the same to another officer. The leave(s) so granted herein would be in addition to the leave sanctioned under the leave policy of KFINTECH.
- 12.7 The Employer shall implement the recommendations of IC received under the preceding clause and send the report of such implementation to the IC.
- 12.8 During the course of Inquiry under this PoSH Policy, IC may if it deems fit and necessary under the circumstances, place the Respondent under suspension, during which period the Respondent shall be eligible for 50 (fifty) percent salary.

13. Inquiry Report:

- 13.1 On the completion of an inquiry under this Policy, the IC shall provide a report of its findings to the employer, within a period of 10 (ten) days from the date of completion of the inquiry and such report shall be made available to the Complainant and Respondent.
- 13.2 Where the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.
- 13.3 Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall

Prevention of Sexual Harassment at Workplace

recommend to the Employer such measures as set out in this Policy.

13.4 The Employer shall implement the recommendation of the IC within 60 (sixty) days of its receipt.

14. Disciplinary Action:

14.1 For the purposes of this Policy, disciplinary action for sexual harassment may result in any one or more of the following;

- a) Written apology
- b) Warning
- c) Reprimand or censure
- d) Withholding of promotion
- e) Withholding of pay rise or increments
- f) Suspension during course of Inquiry
- g) Termination or Dismissal from service
- h) Undergoing counselling session
- i) Carrying out community service

14.2 In addition to the disciplinary action taken in the preceding clause, an appropriate amount as determined by the IC shall be deducted from the salary or wages or any other applicable benefit of the Respondent and paid to the Employee or Aggrieved Person or to Aggrieved Person's legal heirs as compensation.

14.3 If due to absence of the Respondent from his duty or cessation of his employment, the employer is unable to deduct the amount referred to in preceding clause, the Employer may direct the Respondent to pay such amount to the Employee or Aggrieved Person directly.

14.4 If the Respondent fails to pay the amount referred to in the preceding clause to the Aggrieved Person or her legal heirs, the IC may forward the order for recovery of the sum as a 'recoverable arrear' to the District Officer in accordance with the Act.

14.5 In determining the compensation required to be paid by the Respondent to the Employee or Aggrieved Person as per preceding clause, the IC shall have regard to:

- a) The mental trauma, pain, suffering and emotional distress caused to the complainant
- b) The loss in the career opportunity due to the incident of sexual harassment
- c) Medical expenses incurred by the victim for physical or psychiatric treatment
- d) The income and financial status of the Respondent
- e) Feasibility of such payment in lump sum or in instalments.

15. Victimization or Retaliation:

15.1 The Employer shall ensure that any Aggrieved Person subjected to sexual harassment or any Employee giving evidence in connection with an instance of sexual harassment is not victimized or discriminated against, while dealing with complaints of sexual harassment and/or in his/her career in the KFINTECH.

15.2 No Employee will be subjected to retaliatory action relating to his or her report of any alleged sexual harassment.

15.3 The Employer shall forbid and take necessary steps to prevent any form of retaliation against witnesses. Where the witness is found to be false and malicious, action shall be taken against him/her as defined in this policy.

16. Confidentiality:

16.1 All proceedings, documents and records maintained under this PoSH Policy shall be confidential.

16.2 Special privacy safeguards will be applied to the investigation and complaints will be handled on a confidential "need to know" basis. A pseudonym may be used in place of the Complainant's name.

16.3 All persons involved in the proceeding under this PoSH Policy including the parties, witnesses, facilitators, IC members shall be under a duty to respect and maintain confidentiality.

Prevention of Sexual Harassment at Workplace

16.4 The contents of the complaint made, the identity and addresses of the Employee/ Aggrieved Person, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC, as the case may be, and the action taken by the employer or the District Officer under the provisions of this Policy shall not be published, communicated or made known to the public, press and media in any manner.

16.5 However, 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 Employee or Aggrieved Person and witnesses.

16.6 Any person who is entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be subject to disciplinary action.

17. False or Malicious Complaint and false evidence:

17.1 Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the employer of the Complainant, as the case may be, to take action against the Complainant in accordance with the provisions pertaining to 'Disciplinary Action' (Clause 13).

17.2 A mere inability to substantiate a complaint or provide adequate proof will not attract action against the Complainant.

17.3 Before any action is recommended by the IC, the malicious intent on part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed in the rules framed by the KFINTECH under this Policy.

17.4 Where the IC arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend to the employer of the witness, as the case may be, to take disciplinary action against him/her.

17.5 In cases of proven false or malicious complaints, KFINTECH shall take appropriate steps to restore the reputation of the Respondent in the Company.

18. Appeal

18.1 Any person, if aggrieved by the findings and recommendation of the IC or non-implementation of IC recommendations, may file an appeal to a court or tribunal in accordance with the Act, within a period of 90 (ninety) days of the recommendations.

19. Annual Report:

19.1 IC shall prepare an Annual Report at the end of the financial year and submit such Report to the Employer as required under the Act.

19.2 The Annual Report shall contain the following details:

- a) Number of complaints of sexual harassment received in the year
- b) Number of complaints disposed off during the year
- c) Number of cases pending for more than 90 (ninety) days
- d) Number of workshops or awareness programmes against sexual harassment carried out
- e) Nature of action taken by the Employer

20. Awareness

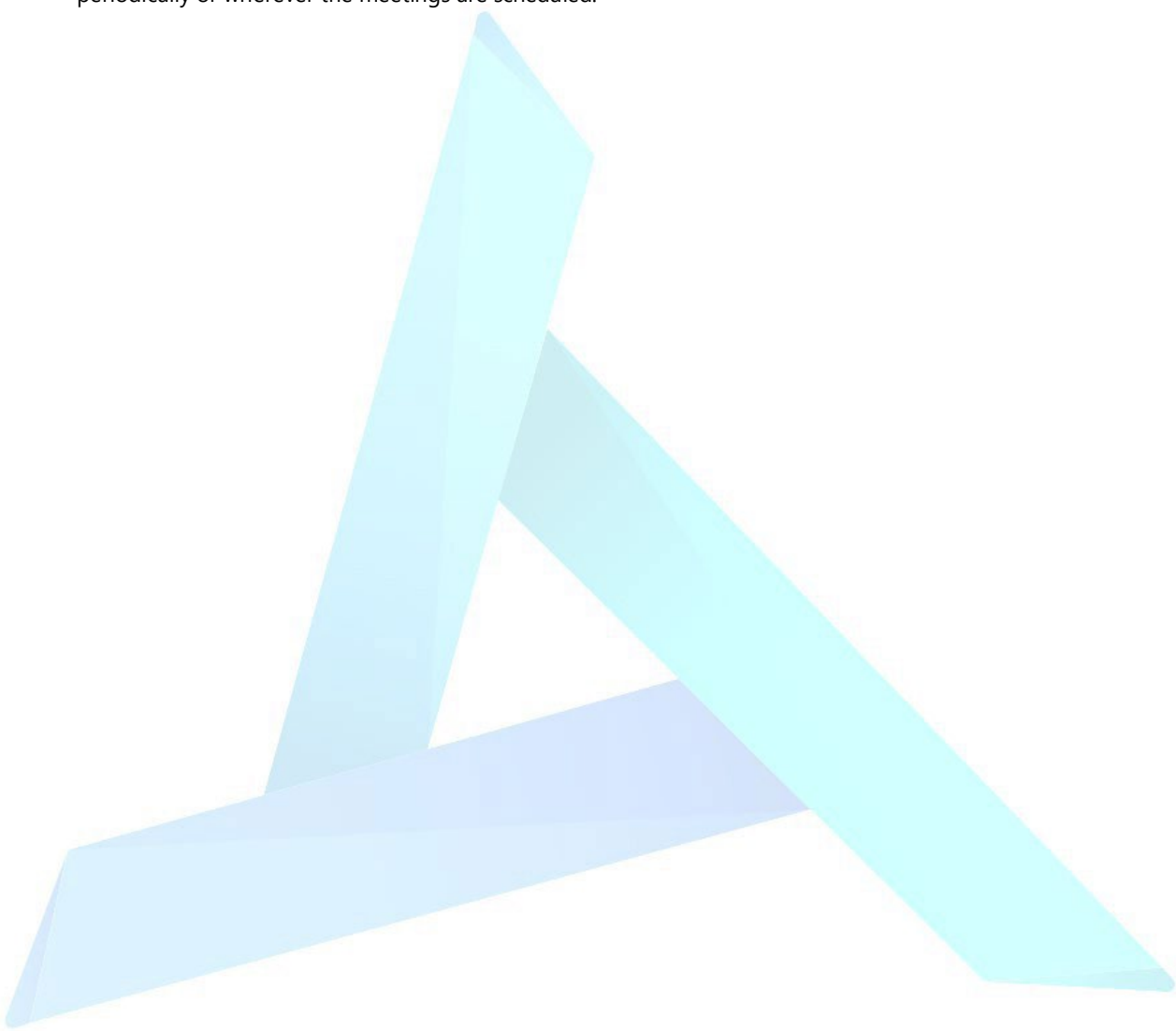
20.1 KFINTECH shall conduct training sessions, workshops, awareness programmes for sensitizing the Employees with the provisions of the Act and on sexual harassment. It is mandated that Employees shall attend these awareness programmes and/or training sessions.

Prevention of Sexual Harassment at Workplace

- 20.2 Any clarification(s) or explanation in respect of this PoSH Policy shall be provided by the Chief People Officer and/or IC Members.
- 20.3 Employees may approach the Legal Department of KFINTECH in case they need any clarification on specific provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder.

21. Reporting

- 21.1 While maintaining the confidentiality obligation, it is the duty of HR representative to publish the report to Audit Committee of the Board on the number of cases /complaints received, if any along with the action taken report on or before 15th of every month. The chairperson of Audit Committee then will have to communicate to the committee as well as Board about the cases received, if any & action taken report thereon under PoSH, periodically or wherever the meetings are scheduled.



Prevention of Sexual Harassment at Workplace

SCHEDULE I

Format of the Complaint

Sr. No.	Query	Particulars
1.	Name of Complainant	
2.	Address and contact number of the Complainant	
3.	Name, address and contact of next of kin of the Complainant	
4.	Immediate supervisor of the Complainant	
5.	Employer of the Complainant	
6.	Name of Respondent	
7.	Address and contact number of the Respondent, if available	
8.	Name, address and contact of next of kin of the Respondent, if known	
9.	Designation of the Respondent, if known	
10.	Immediate supervisor of the Respondent, if known	
11.	Employer of the Respondent, if known	
12.	Details of the incident	
13..	Date and time of incident (If more than one, kindly mention all the dates and times)	
14.	Place of incident (If more than one, kindly mention all the places)	
15.	Witnesses to the incident, if any (If more than one, kindly mention all the witnesses)	
16.	Any oral or written evidence of the incident (attach copies of the documents, if any)	
17.	Names and addresses of person(s) who the Complainant confided in about the incident, if applicable	
18.	Any further relevant details	
I state that the information as stated above is true and accurate		

Date:

Signature of Complainant

Prevention of Sexual Harassment at Workplace

SCHEDULE II

Timelines set out by the law for inquiry proceedings

Submission of complaint (in written form- 6 copies)	Within 3 months of occurrence of last incident.
Notice to the respondent	Within 7 days of receipt of such a complaint
Respondent to respond to the complaint in writing	Within 10 days from the receipt of the complaint from the Internal Committee
Completion of inquiry	Within 90 days from receipt of complaint
Submission of report to the employer as the case may be	Within 10 days from completion of inquiry
Implementation of recommendations	Within 60 days from receipt of the report
Appeal	Within 90 days from the date of recommendations

Prevention of Sexual Harassment at Workplace

SCHEDULE III

COMPOSITION OF INTERNAL COMMITTEE

POSH PRESIDING OFFICER: Shailaja Manukonda - shailaja.manukonda@kfintech.com

POSH CORE COMMITTEE MEMBER: Sujay Puthran – Sujay.Puthran@kfintech.com

POSH CORE COMMITTEE MEMBER: Manisha Shinde - manisha.shinde@kfintech.com

EXTERNAL POSH MEMBER – Kavita Sethi Jain - cskavita.sethijain@gmail.com

Sl No	Name of SPOC	Name of the branch	Email ID
1	Promod Kumar	Patna	kumar.pramod@kfintech.com
2	Leela Joppen	Ahmedabad	leela.joppen@kfintech.com
3	Bakshe Rakesh Dilip	Surat	rakesh.bakshe@kfintech.com
4	Dhwani KEYUR Shah	Baroda	dhwani.shah@kfintech.com
5	Sreelakshmi M	Bangalore-Puttana Road	sreelakshmi.m@kfintech.com
6	Sudeesh K A	Cochin	sudeeshka.23@kfintech.com
7	Nutan Rajendra Shirke	Mumbai-Crossly House	nutan.shirke@kfintech.com
8	Shaikh Kounain Jameel	Mumbai-Borivali	shaikhkounain.jameel@kfintech.com
9	Chetan Shinde	Mumbai-Thane	chetan.shinde@kfintech.com
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11	Suvidha Rushikesh Mayekar	Mumbai-Andheri	suvidha.mayekar@kfintech.com
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13	Muskan Mahajan	New Delhi	muskan.mahajan@kfintech.com
14	Meena Rawat	Chandigarh	meena.joshi@kfintech.com
15	Babu Lal Joshi	Jaipur	babulal.joshi@kfintech.com
16	Arun Kumar B	Coimbatore	arun.bk@kfintech.com
17	Sangeetha Vasudevan	Chennai-Capital Towers	sangeetha.vasudevan@kfintech.com
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19	Saurabh Kumar Singh	Lucknow	saurabh.singh@kfintech.com
20	Sandeep Kumar	Kanpur	sandeepkumar.kanpur@kfintech.com
21	Manjo Kumar Singh	Varanasi	manojkumar.singh@kfintech.com
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24	Moushumi Mayuresh Karnik	Mumbai-Kurla	moushumi.karnik@kfintech.com
25	Raj Gupta	Agra	raj.gupta@kfintech.com