



PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

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I. Objective:

Venus India Asset-Finance Private Limited (“Organization”), being a Non-Banking Financial Company, is committed to maintaining the highest standards of integrity, professionalism, and workplace dignity. The Organization recognizes that a safe and inclusive work environment is integral to its governance framework and operational effectiveness.

This Policy is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made thereunder. The Policy seeks to provide protection against sexual harassment at the workplace, to prevent the occurrence of such acts, and to establish a time-bound mechanism for redressal of complaints.

II. Scope and Applicability:

This Policy shall apply to all employees of the Organization, irrespective of their employment status, including permanent employees, probationers, trainees, interns, consultants, contractual employees, and directors. It shall also extend to individuals who interact with the Organization in a professional capacity, including vendors, service providers, agents, customers, business correspondents, and any other third parties.

The Policy shall apply to all workplaces of the Organization, including head office, branch offices, regional offices, field locations, and any other premises where work-related activities are carried out. It shall further extend to any place visited by an employee arising out of or during the course of employment, including transportation provided by the Organization, off-site meetings, training programs, and business travel. For the purposes of this Policy, workplace shall also include virtual or digital environments such as emails, video conferences, messaging platforms, and other electronic means used for official communication.

III. Definitions:

1. **POSH Act:** The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;

2. **Organization:** Venus India Asset-Finance Private Limited;
3. **Aggrieved woman:** Any woman mentioned in Clause II above, who is subjected to Sexual Harassment at workplace;
4. **Complainant:** A person who files a complaint of sexual harassment suffered or caused to her or any other person;
5. **Respondent:** Against whom the complaint is given;
6. **Employer:** The person(s) responsible for the management, supervision and control of this workplace and discharging contractual obligations with respect to his/her employees;
7. **Sexual harassment:** Sexual harassment includes any unwelcome act or behaviour, whether directly or by implication, such as physical contact and advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, or any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

Sexual harassment may occur under circumstances that include, but are not limited to, situations where submission to such conduct is made a condition of employment, where submission to or rejection of such conduct is used as the basis for employment decisions, or where such conduct interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

The determination of whether an act constitutes sexual harassment shall be based on the facts and circumstances of each case and the perception of the aggrieved woman.

IV. **Internal Committee:**

1. This organization has formulated an Internal Committee (hereafter referred to as IC). The IC will receive and redress complaints of sexual harassment.
2. The IC consists of:
 - a. Presiding Officer who is a woman employed at senior level.
 - b. 2 Internal Members who are employees
 - c. An External Member from NGO / legal background familiar with

women's rights.

3. At least 50% of the members of the IC will be women. The Composition and role of IC shall be circulated within the organization by way of an Internal office Memorandum.
4. A quorum of minimum three members will be present for the proceedings to take place.
5. The IC members will be reconstituted every three years as per the POSH Act.

V. Lodging A Complaint:

Any aggrieved woman who is subject to sexual harassment at workplace should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The aggrieved woman may file a complaint as an email to the mailbox poshgrievance@venusfin.com containing all relevant information identified in Annexure-I.

1. Deadline to file a complaint: The complaint needs to be filed within 3 months from the date of the incident. In case there is a series of incidents, complaint should be filed within 3 months from the date of the last incident.
2. IC, at its own discretion, may extend the said timeline for filing complaint but cannot be extended more than three months, if it is satisfied that circumstances were such which prevented the woman from filing a complaint within the said period.
3. Anonymous complaints will not be accepted.
4. Where such complaint cannot be made in writing, the Presiding Officer or any Member of the IC, will render all reasonable assistance to the aggrieved woman for making the complaint in writing.
5. (i) Where the aggrieved woman is unable to file the complaint due to physical incapacity, complaint can be filed by:
 - a. A friend or a relative
 - b. A co-worker
 - c. An officer of NCW or State Women Commissions or
 - d. Any person who has knowledge of the incident with the written consent

of the aggrieved woman.

(ii) Where the aggrieved woman is unable to file the complaint due to mental incapacity, complaint can be filed by:

- a. A friend or a relative
- b. A special educator
- c. A qualified psychiatrist or psychologist
- d. The guardian or the authority under whom the aggrieved woman is receiving treatment or care or
- e. Any person who has knowledge of the incident jointly with her relative, friend, a special educator, qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.

(iii) Where the aggrieved woman is unable to file the complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the aggrieved woman.

(iv) Where the aggrieved woman is dead, a complaint can be filed by any person who has knowledge of the incident with the written consent of aggrieved woman's legal heir.

6. Upon receipt of the complaint, the IC will forward a copy of the complaint to the respondent within 7 working days from the date of receipt of the complaint.

VI. Conciliation:

1. Upon the receipt of the complaint, at the request of the aggrieved woman, the IC will take steps to resolve the matter through conciliation.
2. Resolution through conciliation may be facilitated within 30 days from the receipt of the complaint.
3. The proceedings will be recorded in writing. No settlement for monetary compensation will be executed. A copy of such settlement will be provided to the employer, the complainant and the respondent.
4. If a settlement is arrived, no further inquiry will be conducted by Internal Committee.

VII. Inquiry:

1. In case no settlement is arrived at, or the settlement arrived at in conciliation is not complied with, then the matter will be inquired by the IC. The same will be communicated to the complainant and the respondent.
2. If the complainant and/or the respondent desires to present witnesses and evidence, they should communicate this in writing to the IC.
3. If the Complainant and/or the Respondent desires to produce any documents as evidence they should provide original copies of the same. Evidence in digital/electronic form will be forwarded to the IC in such manner ensuring that the same is not tampered.
4. The IC will complete the Inquiry within ninety (90) days from the receipt of the complaint.
5. The IC will prepare and submit the inquiry report along with its findings and recommendations to the employer within 10 days from the completion of the inquiry. A copy of the inquiry report is shared with the Complainant and Respondent.
6. Employer will implement the recommended actions within 60 days from the receipt of the inquiry report.
7. In case the Complainant communicates her desire to file a complaint with the police before, during or after the inquiry, the IC will support her to do so.

VIII. Interim Measures:

During pendency of inquiry, based on the requests made by the Complainant, the IC may allow interim relief which could include:

- Change of reporting structure or duties
- Temporary transfer of either party
- Grant of paid leave to complainant (up to 3 months)
- Restriction on interaction
- Any measure necessary to ensure safety

IX. Findings And Disciplinary Action:

A. If Allegation is Substantiated:

Actions may include:

- Written warning or apology
- Reprimand or Censure
- Counselling
- Deduction of salary/wages
- Withholding of promotion or pay rise or increment
- Suspension or termination
- Termination of contract or service agreement
- Community Service
- Legal action where required

B. If Allegation is Not Substantiated:

No action shall be taken against the Respondent.

C. False or Malicious Complaint:

If proved to be malicious, disciplinary action in accordance with the POSH Act and Rules framed thereunder may be taken against the Complainant or such other person referred in Clause V (5) above.

Failure to prove a complaint **does not** mean it is false.

X. Protection against Retaliation:

1. Our organization prohibits any form of retaliatory or discriminatory behavior against the complainant or the witnesses.
2. If the IC notices that any person indulges in retaliation or discrimination against the complainant or the witness, it will recommend the employer to

take strict action against the guilty.

3. Any individual who experiences retaliation or discrimination for reporting or testifying a sexual harassment complaint should bring it to the notice of the IC.

XI. Confidentiality and Privacy:

1. Organization will strive to maintain confidentiality with respect to any information related to the aggrieved woman, respondent, witnesses.
2. Anyone who violates the confidentiality clauses will be subject to action as per the POSH Act and Rules framed thereunder.

XII. Appeal:

1. Any person aggrieved with the findings and/or recommendations of the IC as mentioned above, and/or the non-implementation of such recommendations, may prefer an Appeal to the Court or Tribunal in accordance with the applicable provisions of the POSH Act.

XIII. Responsibility of the Employees:

1. All employees must ensure that their conduct is in accordance with this policy and POSH Act.
2. All employees should read the policy. In case of any questions regarding the policy or the POSH act, employee should seek clarification from any of the IC members.

XIV. Governing Law:

1. This Policy is governed by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and applicable rules thereunder.

Annexure I

Information to be included in Sexual Harassment Complaint

- **Date of complaint submission**
- **Details of the aggrieved**
 - Name of the aggrieved
 - Designation (if an employee)
 - Unit/Division/Department (if an employee)
 - Phone Number
 - E-mail address

- **Details of the complainant (if the complainant is filing the complaint on behalf of the aggrieved)**
 - Name of the complainant
 - Designation (if an employee)
 - Relationship of the complainant with the aggrieved (friend, co-worker, etc.)
 - Unit/Division/Department (if an employee)
 - Contact number
 - E-mail address
 - Reason for the inability of aggrieved to file complaint

- **Details of the Respondent**
 - Name of the respondent
 - Designation (if an employee)
 - Unit/Division/Department (if an employee)
 - Relationship of the respondent with the aggrieved (supervisor, co-worker, vendor, client, etc.)
 - Contact number
 - E-mail address

- **Details of the Incident**
 - Date of the incident(s)
 - Description of the incident
 - In case of a series of incidents, list all the incidents along with the date of each
 - Witnesses and their contact details
 - Documents that serve as evidence
 - Name and contact details of any person(s) contacted by the aggrieved after the incident (if any)