 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

Clix Capital Services Private Limited (CLIX)

Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

Effective Date:	May 26, 2023
Current Review Date:	May 30, 2024
Last Review Date:	May 26, 2023
Approved by:	The Board of Directors
Policy Owner	Presiding Officer & HR Manager
	Version 1.0 of 2024

Note: This policy applies to all subsidiaries of Clix Capital.



 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

TABLE OF CONTENTS

1. Purpose
2. Scope
3. Definitions
4. Committee
5. Complaints (Who, How, When)
6. Conciliation
7. Interim Measures
8. Inquiry Procedure
9. Actions
10. General
11. Policy Review

Annexure 1: The Sexual Harassment Case Handling Process Map

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024


1. Purpose

- A. Clix Capital Services Private Limited** (also referred to as “**CLIX**” or the “**Company**”), is committed to provide a non-discriminatory, non-hostile and harassment free work environment for women.
- B.** The objective is to provide equal opportunity and a harassment-free Workplace to all its Employees (Workplace and Employees are defined hereinafter) without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability.
- C.** Accordingly, this Policy is formulated under the Company’s Policies and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (hereinafter referred as the “**Act**”); and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred as the “**Rules**”)
- D.** Although under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules enacted thereunder, protection has been provided only to women, this policy extends the protection against sexual harassment to everyone, regardless of gender.
- E.** The process of handling a complaint of sexual harassment will take place in the following manner:
 - a. Where the aggrieved person is a woman, the complaint shall be handled by the Internal Committee (IC) constituted under the 2013 Act, the procedure shall be as prescribed under law and this policy and execution of order/ action/recommendation in such complaints shall be carried out under 2013 Act and this policy.
 - b. Where the aggrieved person is not a woman (male, non-binary, transgender, etc.), the complaint shall be handled by the Sexual Harassment Complaints Committee (SHCC) constituted under this policy, the procedure shall be as prescribed under this policy and the execution of order/ action/ recommendation in such complaints shall be carried out under code of conduct of the Company.
- F.** As a reminder, all employees of the Company continue to be bound by the Company's Code of Conduct and other Policies.

2. Scope

This policy is applicable to all of **Clix Capital’s (including its subsidiaries)** Workplaces.

3. Definitions:

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

For the purpose of this Policy,

A. **“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; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Further, any of the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment-


- (i) implied or explicit promise of preferential treatment in her employment;
- (ii) implied or explicit threat of detrimental treatment in her employment;
- (iii) implied or explicit threat about her present or future employment status; or
- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) humiliating treatment likely to affect her health or safety.

B. **“Workplace”** means all the administrative locations of **CLIX** and includes any place visited by the employee of **CLIX** arising out of or during the course of employment including transportation provided by the Company for undertaking such journey. It includes Premises, locations, offices, branches or units established, owned and controlled by the Company. Workplace extends to remote working scenarios or any virtual platform used for execution of duties of employment.

C. **“Aggrieved Individual”** in relation to a **CLIX** Workplace means any individual of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the respondent.

D. **“Employer”** means the Business / Functional Leader who is responsible for the management, supervision and control of the respective Workplace. The Employer will be responsible for the purpose of implementation and execution of this policy and committee recommendations.

E. An **“Employee”** means a person engaged with CLIX for any work on permanent, temporary, part-time, ad hoc or daily wage basis, either directly or through an agent,

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

including a retainer, a contractor, with or without the knowledge of the principal retainer, whether for remuneration or not, or working voluntarily or otherwise, whether the terms of engagement are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.


4. Committee

- A. The Company will constitute an **“Internal Complaints Committee”** (also referred to as **“Committee”**) representing all its administrative units or offices to investigate into complaints of Sexual Harassment of a woman at the Workplace.
- B. The Committee will be constituted in accordance with the requirements of the Act and Rules as under:
 - a) Senior woman employee to be appointed as Presiding Officer. If a senior woman employee is not available in the Company, the Presiding Officer can be nominated from another Clix Capital India legal entity.
 - b) Minimum two members to be appointed from among employees preferably committed to the cause of women / have experience with social work / have legal knowledge.
 - c) One external member to be appointed from among NGOs / persons familiar with sexual harassment issues.
 - d) At least half of the total members should be women. The members shall be appointed for a period of 3 years.
- C. The Chief Human Resource Officer (CHRO) shall, from time to time, review the membership of the Committee and make appropriate changes, by announcements in writing.

5. Complaints

A. Who

- i. Any Aggrieved Individual from a CLIX Workplace can approach any member of the Committee with a complaint regarding Sexual Harassment.
- ii. Where the Aggrieved Woman is unable to make a complaint due to mental, physical incapacity or for any other reason, the designated representative as prescribed under the Act or Rules (hereinafter referred to as “Complainant”) can file the necessary complaint in the prescribed manner.
- iii. All concerns falling under the category of Sexual Harassment, received by any Company official, Ombudsperson or any other employee of the Company shall be forwarded / directed to any member of the Committee within one week of receipt, for further action by the Committee.

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

B. How

- i. The complaint should be submitted in writing in 6 copies to any member of the Internal Complaints Committee.
- ii. The complaint should contain following details:
 - a) Name of Complainant / Aggrieved Woman
 - b) Name of Respondent
 - c) Details of incident or incidents
 - d) Date of the incident
 - e) Evidence, if available
 - f) Names and details of witnesses, if available

C. When

The complaint should be submitted within a period of three months from the date of the incident of Sexual Harassment, and in case of a series of incidents, within a period of three months from the date of the last incident.


6. Conciliation

- A. The Committee shall, before initiating inquiry, on the written request of the Aggrieved Woman, offer the option of conciliation between the complainants and the Respondent.
- B. No monetary settlement shall be made as a basis of conciliation.
- C. The conciliation process should be carried out and implemented in accordance with the Act and Rules.

7. Interim Measures

During inquiry, on a written request made by the Aggrieved Woman or Complainant, the Committee may recommend to the Employer to:


- a. transfer the Aggrieved Woman or the Respondent to any other team / department or other branch / location within the Company; or
- b. grant paid leave to the Aggrieved Woman up to a period of three months or until such time as the investigation is completed, whichever is earlier; or
- c. restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her EMS and assign the same to another person; or
- d. require the Respondent to remain or work from home or work out of an office where the Aggrieved Woman is not located, if this is considered necessary in the facts and

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

- circumstances of the case; or
- e. grant such other relief to the Aggrieved Woman as may be prescribed by the Act / Rules / applicable Standing Orders / Company Policy or as may be necessary.

8. Inquiry Procedure

- A. The Committee shall inform the Employer in writing of the fact of it having received a complaint.
- B. The Employer shall nominate the Presiding Officer, External Member and minimum one more member of the Committee to conduct the inquiry, taking into account the administrative location related to the complaint,
- C. The Presiding Officer shall chair the Committee meetings. If the Presiding Officer is absent or unable to attend the meeting then the members present shall elect a Presiding Officer for the meeting who shall be a senior woman employee from amongst the other members of the Committee.
- D. The complaint shall be inquired into in accordance with the principles of natural justice and as per the process prescribed in the Act and Rules. Please refer to **Annexure – 1** for the Sexual Harassment Case Handling Process Map
- E. **CONFIDENTIALITY:** The contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the POSH Committee and the action taken on the Respondent shall NOT be published, communicated, or made known to the public, press and media in any manner. Strict confidentiality shall be maintained during the inquiry by all who are part of the proceedings, including Complainant, Respondent, witnesses, and the members of the POSH Committee. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the Complainant and witnesses.
- F. The POSH Committee shall have the power to summon and enforce the attendance of any person, conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
- G. The POSH Committee shall have the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- H. The Complainant and the Respondent shall not be allowed to bring in any legal

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024


practitioner to represent them in their case at any stage of the proceedings before the POSH Committee. However, they may be accompanied by a colleague or a family member for psychological or emotional support. Such colleague or family member shall not be allowed in the meeting room where proceedings of the POSH Committee are taking place.

- I. All colleagues and witnesses who are part of the POSH Committee proceedings shall keep all details thereof confidential
- J. The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint, unless the time is extended by the POSH Committee depending upon the facts of the case.
- K. After completing its inquiry, the Committee will submit recommendations and its report to the Employer for further action, if any, within ten days of the conclusion of the inquiry. The Committee's report will also contain recommendations on action, if any, required to be taken on the complaint and also corrective, preventive and other actions, if any, required from the Company.

9. Actions

- A. The Company views Sexual Harassment complaints very seriously and notwithstanding anything contained in any other Policy of the Company, the following acts shall constitute a 'misconduct' and breach of ethical behavior:
 - a) **Sexual Harassment;**
 - b) Making **malicious allegations of Sexual Harassment** against the Respondent;
 - c) Making of a complaint of Sexual Harassment **knowing it to be false;**
 - d) **Producing a forged or misleading document** before the Committee; In case the POSH Committee 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 has produced any forged, fabricated or misleading document, it may recommend taking suitable action against the Complainant who has made the complaint, as prescribed under applicable law.
 - e) Harassment or **intimidation** of a complainant or witness or other person in connection with a Sexual Harassment complaint;
 - f) **Disclosure of the identity** or address of the complainant, the person complained against or any witness or any other **confidential information** or material in connection with a Sexual Harassment complaint;

However, it is clarified that a **mere inability to substantiate a complaint or provide adequate proof will not constitute 'misconduct'** or a breach of ethical behavior.

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

B. 'Misconduct' or breach of ethical behavior as mentioned above is punishable with appropriate disciplinary action in accordance with service rules of the company including

1. written apology or
2. written or oral warning, reprimand or censure or
3. withholding of promotion / pay rise / increments or
4. deduction from salary of Respondent to be paid to Aggrieved Woman or
5. termination of services or
6. counseling or
7. community service

as may be deemed fit by the Committee.

C. Recommendation of the Committee shall be acted upon by the Company within a period of sixty days of the date of receipt of the Committee's report.

D. Non-Retaliation - The Company will not accept, support, or tolerate retaliation in any form against any employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action:


- a. Retaliation will be treated as a major misconduct.
- b. Retaliation against those reporting Sexual Harassment is prohibited by this Policy.
- c. Retaliation means and includes any hurtful employment action against the individual/s.
- d. Anyone suspecting or experiencing retaliation should report to the POSH Committee.

10. Appeal: If any person is aggrieved from the recommendations made by the POSH Committee or no implementation of such recommendations, they may appeal to the appropriate authority, as specified by the law, within a period of ninety days of the recommendations.

11. General

A. The Company will ensure compliance with all the requirements of the Act and Rules and will ensure that this Policy, including the Committee members' information and the penal consequences of Sexual Harassment are displayed on the notice boards of all its administrative locations.

B. The Company will organize workshops and awareness programs at regular intervals for

 Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

sensitizing the employees with the provisions of the Act and training programs and seminars for the members of the Committee to effectively handle the complaints in the manner as prescribed in the Act and Rules.

- C. In each calendar year, the Committee shall prepare quarterly reports and submit the same to the Board of Directors. An annual report shall also be prepared at the end of the calendar year and submitted to Board of Directors and the District Officer at such time as may be prescribed under the Act or Rules. The Committee shall include in the quarterly and annual reports information regarding:
- i. number of cases filed & their disposal under the Act and Rules;
 - ii. actions taken;
 - iii. number of complaints pending for more than 90 days and
 - iv. number of workshops and awareness sessions conducted on Sexual Harassment.

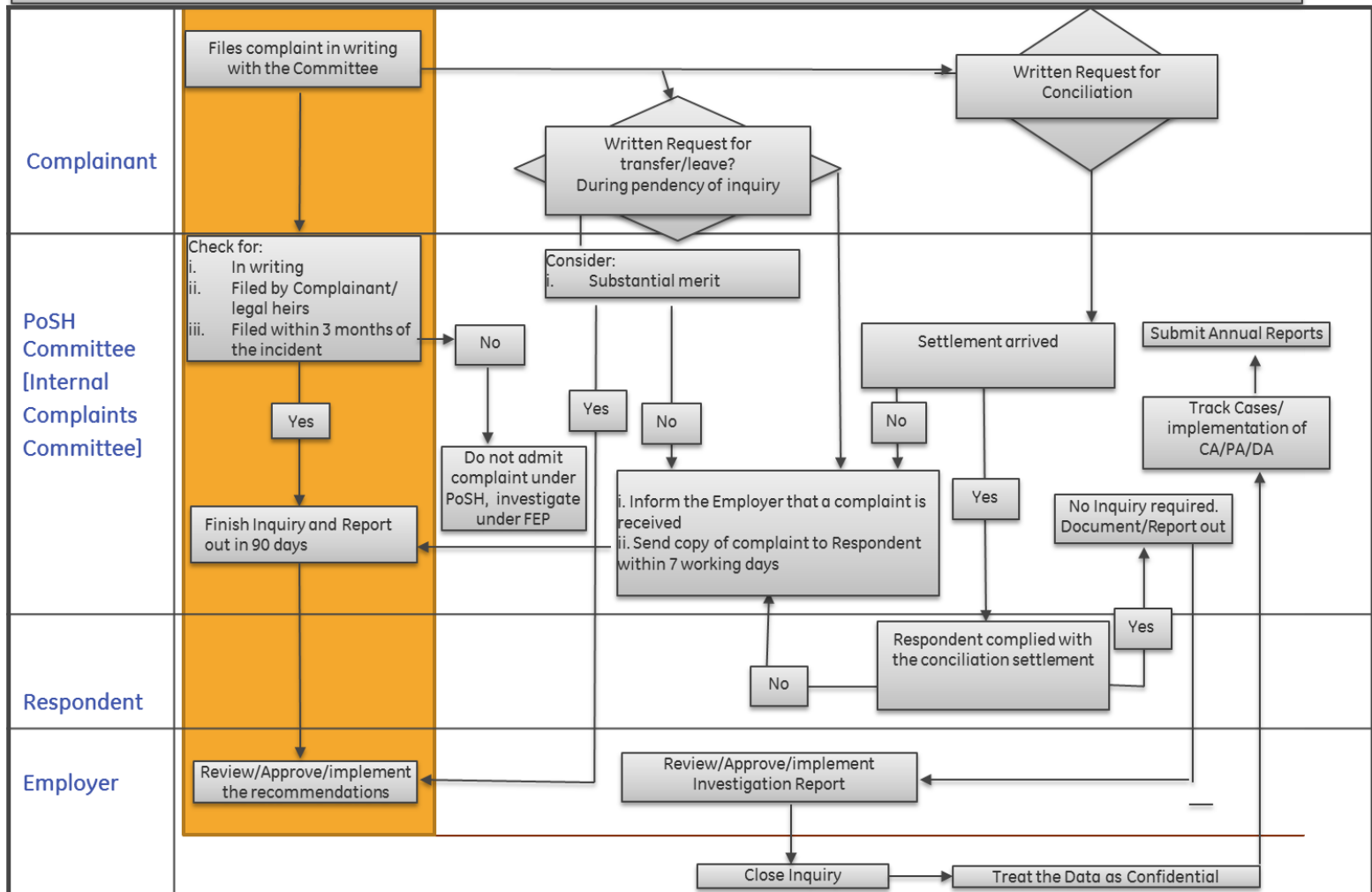
12. Policy Review

The Policy may be reviewed by the Board of Directors of the Company and the Compliance Officer of the Company, at such intervals as and when deemed necessary, in order to align the same with the prevalent regulatory and business requirements, to ensure that it remains consistent with the overall objectives of the Company and with the laws then in force. The Policy may be reviewed at shorter intervals if the law pertaining to Sexual Harassment changes before the stipulated time of review.

Subject: Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace	Original Issue Date: September 02, 2013	Current Effective Date: May 26, 2023
	Review Dates: May 26, 2023 October 03, 2016 February 27, 2015 August 28, 2014 March 31, 2014	Policy No.: Version 1.0 of 2024

Annexure 1

The Sexual Harassment Case Handling Process Map



***** End of the Policy *****