

<b>Policy Name</b>	<b>Prevention of Sexual Harassment (POSH)</b>
<b>Version</b>	1.2
<b>Last updated on</b>	20 October 2021

**Applicability:** This policy is applicable to employees of Angel Group Companies

**Objective:** Angel Ones' philosophy is to encourage growth of individuals irrespective of gender, religion, caste or community to enable employees have safe, secure and congenial work environment, so that employees can deliver their best without inhibition.

The Company strongly believes that every employee has the right to work with dignity and strongly condemns any form of harassment including sexual harassment. The company in furtherance of the objective of prohibiting any form of sexual harassment at workplace shall comply with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act")" and rules thereafter.

In accordance with the said provision of law, this policy on Prevention of Sexual Harassment at work place has been implemented at the workplace. The policy has been framed incorporating the provisions of the Act and the Rules with the prime objective of preventing, prohibiting and redressing an incident of sexual harassment occurring at the workplace.

**1. Sexual Harassment:** Sexual Harassment will include any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- Physical contact and advances; or
- Demand or request for sexual favors; or
- Making any sexually coloured remarks; or
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

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

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

**Sexual Harassment Policy:**

- All employees of the Company are expected to maintain a productive work environment that is free from sexual harassment.

- No employee is to threaten or insinuate, either explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect employee's terms or conditions of employment.
- Any employee who believes that a manager's, other employee's, or staff member's actions or words constitute sexual harassment has a responsibility to report or complain about the situation as soon as possible preferably within three months from date of incident. The report or complaint should be made as per the procedure given below.
- All complaints of sexual harassment will be investigated promptly and in an impartial and confidential manner. It is obligatory for all employees to cooperate in the process of investigation.
- Any employee who is found to have violated the sexual harassment policy will be subject to appropriate disciplinary action including termination.
- The Company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about sexual harassment. However, if on investigation of a complaint shows that the complaint or information given during the course of investigation by the complainant or any witness was false, the individual who provided the false information including the complainant will be subject to disciplinary action including termination.
- Where the conduct of employee would constitute an offence under the Indian Penal Code or any other law, the Company shall initiate necessary legal action in accordance with The sexual harassment of Women at work place (Prevention, prohibition and redressal), Act, 2013 (herein after referred as the Act) after conducting a preliminary enquiry in to the matter.

**Internal Complaints Committee:** The Company has a centralized Internal complaints committee at its Corporate Office 6th Floor, Ackruti Star, MIDC, Andheri (East), Mumbai 400 093 to address any complaints of sexual harassment. The Complaints committee comprises of members as nominated by the Board of Directors of Angel. The Board of Directors may from time to time as it deems fit/necessary alter/change the composition of the Complaints Committee. The complaints Committee is constituted to address all Complaints. The Complaints committee comprises of:

**Chairperson for Internal Complaints Committee**

S. No.	Name	Designation
1	Boneya Sam	Lead - Employee Grievance

**Committee members for Internal Complaints Committee**

S. No.	Name	Designation
1	Poonam Chaudhary	Deputy Vice President - Revenue
2	Sukhbir Singh Bhinder	Deputy Vice President - Legal and Compliance

3	Amar Singh	Senior Vice President - Head Equity Advisory
4	Sumati Atre	External Member

## 2. Complaints Mechanism:

- The Complainant is required to make a written complaint addressed to the “Internal Complaints Committee” on [posh@angelbroking.com](mailto:posh@angelbroking.com) (herein after referred as the Committee) within three months from the date of incident and in case of series of incidents within three months from the date of last incident. In exceptional cases, Committee can condone the delay up to three months.
- On receipt of the complaint, the Employer will decide the names of the Committee members (from the available list of Committee members as mentioned in Annexure - A) who would be looking into the matter. While identifying the committee members utmost care should be taken by the Employer to ensure that the Committee member is not from the same function as that of the Complainant or the Respondent to avoid any conflict of interest scenarios.
- The Employer will issue a mandate to the identified Committee members and will request them to look into the complaint. The Employer may also depute an official from HR team who may brief the Committee members about the complaint, coordinate meetings of the Committee etc.
- The Committee may seek assistance of the investigation team/any officer of the Company to investigate the matter, collect evidences in accordance with the allegations made in the Complaint, assist them etc. during the course of enquiry. The appointed person shall be required to follow the directions given by the Committee. The appointed person shall also be required to submit his / her report to the Committee giving an update on the assignment given, assignment completed etc.

## 3. Complaint Process

- The Complainant is required to submit 6 copies of the complaint to the Committee. The complaint should also contain details of incidents, name and details of the person against whom complaint has been made, list of witnesses and evidence in support of the complaint.
- On receipt of the above mentioned complaint, the Committee will forward one copy of the complaint to the person against whom allegation has been made (herein after referred as the Respondent) within 2 days of receipt of the complaint asking him to furnish his/her written explanation against the allegation made by the Complainant.
- The Respondent is required to file his/her reply along with supporting documents and list of witnesses and their details within 10 working days from the date of receipt of the copy of the complaint from the committee which would be further investigated by the Committee.

- On receipt of the reply from the Respondent, the Committee will schedule an enquiry in to the matter within 5 working days. Accordingly the Committee will communicate to both the concerned parties on the following:

- Date of hearing
- Time of hearing
- Venue of hearing
- Name and details of the Committee members
- In case if the Respondent failed to appear for three consecutive hearings, without sufficient cause and prior intimation, the Committee is required to issue a 15 days' notice to the Respondent intimating him that on expiry of the 15 days, matter will be proceeded against him ex-parte.
- The enquiry in to the matter should be completed by the Committee within 60 days.
- On completion of the enquiry, the committee is required to share its recommendations with the employer and the concerned parties (Complainant and Respondent) within 7 days of completion of the enquiry.
- Neither party shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Committee.
- Committee will have powers of Civil Court as provided under the Act and hence can summon any employee/witnesses, require production of documents etc.

4. **Interim Relief by the Committee:** The Committee, on the request of Complainant, may provide for following interim relief even without conducting an enquiry in to the matter:

- a) Transfer Complainant or Respondent to any other location
- b) Grant leave to Complainant up to three months over and above privilege leave
- c) Grant such other relief at the Complainant as may be provided

The Committee is required to forward its interim recommendation to the employer and the employer is required to comply with the same within 7 working days and forward its report on the implementation of the recommendation forthwith to the Committee.

**Disciplinary Action:** Based on the investigations and findings of the Committee and its report, disciplinary action shall be initiated. The Chief: Human Resources shall initiate the following action, including termination of employment, on receipt of the recommendation from the Committee.

- If the Respondent is found guilty of Sexual Harassment as per definition stated above, the services of the Respondent would be terminated or such action would be initiated as recommended by the Committee in accordance with the Act and Service Rules of the Company
- The Committee can also recommend deduction of an appropriate amount from the salary of the guilty person such sum as it may consider necessary to be paid to the complainant as the

case may be. In case of failure of the respondent to pay the said sum, the Committee shall forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

5. **Appeal's Committee:** Any person aggrieved by the recommendation or non-implementation of the recommendations made by the Committee may prefer an appeal to the Appeals Committee of the Company on [appeal.posh@angelbroking.com](mailto:appeal.posh@angelbroking.com) within 90 days from the date of the recommendation.

The Appeal Committee will review the recommendations of the Internal Complaints Committee within 90 days from the date of complaint made to the Appeal committee. The Appeal committee comprises of:

#### Chairperson for Appeal Committee

S. No.	Name	Designation
1	Rashmi Anthony	Head of Learning and Development

#### Committee members for Appeal Committee

S. No.	Name	Designation
1	Pramita Shetty	Head - Sales Quality & Support
2	Bhavin Parekh	National Head - Customer Engagement
3	Ketan Shah	Chief Strategy Officer
4	Pratiba Naitthani	External Member

**Review of the Sexual Harassment Policy:** The Sexual Harassment Policy will be reviewed once annually or at such intervals as and when required by the Employee Conduct, Risk and Compliance forum of the Company.

**Note:** The Company reserves its right to modify the provision of the Policy any time without any notice in consultation with its Employee Conduct, Risk and Compliance forum. The employees are advised to read the applicable laws and rules on the subject and get themselves well versed with the law of the land