
Prevention of Sexual Harassment (POSH) Policy

**of
Bandhan AMC Ltd.**

Document Version Control

Date	Author	Reviewed by	Version	Change Reference
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September 22, 2021	-	-	1	Existing policy document. Last changes to the policy were effective September 22, 2021.
May 9, 2024	Bina Kotian	Swati Singh	1/2024	Adoption of standalone policy document. Document version control added.
February 6, 2025	Bina Kotian	Swati Singh	1/2025	Updation in designation of Policy Owner to "Head – Human Resource" from "Head - Human Resources & Administration"
February 10, 2026	Desiree Emanuel	Swati Singh	1/2026	- Composition of the Internal committee is updated in line with the Circular Resolution 15/2025-26 dated November 24, 2025. - Nomenclature is revised from "Head HR" to "Chief Human Resources Officer" across the policy. - Former Name of the AMC is deleted.
July 22, 2026	Desiree Emanuel	Swati Singh	1/2027	- Inclusion of local representatives - Delegation of Authority to CEO to constitute, reconstitute the Internal Committee by appointing, replacing, or removing its members or the local representatives - Display of Local Representatives alongside Internal Committee members at applicable locations

Note: This policy is a part of the Employee Handbook of Bandhan AMC.

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1. Background

Bandhan AMC Ltd.('Company') is committed to fostering a work environment that promotes dignity, mutual respect, professionalism and equal employment opportunities. The Company is committed to providing a safe, healthy and inclusive workplace where employees work without fear of prejudice, gender bias and sexual harassment or retaliation as defined under this Policy . Towards this, it is essential that all employees deal with their colleagues and third parties with fairness and respect, keeping in mind that his/her behavior can affect the internal and external reputation of the AMC.

The Company expects all employees and people associated with its business to conduct themselves with fairness, integrity and respect while interacting with colleagues, customers, vendors, business partners and other stakeholders. Such conduct is fundamental to maintaining a workplace that reflects values, protects the dignity of individuals.

2. Objective

The objective of this Policy is to prevent, prohibit and redress incidents of sexual harassment at the workplace and to provide a fair, impartial, confidential and time bound mechanism for addressing complaints in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ('POSH Act').

The Company adopts a zero-tolerance approach towards sexual harassment and is committed to ensuring that all complaints are dealt with fairly, objectively and in accordance with the principles of natural justice...

3. Features

The Sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ('POSH Act') and the Rules framed thereunder provide protection against sexual harassment of women at the workplace and prescribe measures for the prevention, prohibition and redressal of complaints relating to sexual harassment. In compliance with the provisions of the POSH Act, the Company has constituted an Internal Committee ('IC') and is committed to implementing appropriate measures for prevention, awareness, inquiry and redressal of complaints under this policy.

4. Policy Scope

This Policy applies to all categories of employees of the Company, including permanent employees, trainees, apprentices, interns, temporary employees, employees engaged on fixed-term contracts, consultants and persons engaged through contractors, at all workplaces of the Company.

The Policy applies to all work-related settings and activities, whether within or outside the Company's premises, including client locations, business travel, meetings, conferences, training programmes, official events, off-site programmes, transportation provided by the Company and work-related interactions through electronic or digital communication platforms.

The Company expects customers, vendors, consultants, contractors, business partners, visitors and other third parties interacting with its employees to conduct themselves in a manner consistent with the principles of this Policy. Where allegations involve a third party, the Company shall take such preventive,

contractual, administrative or legal measures as may be considered appropriate under the circumstances and in accordance with applicable law. .

5. Policy Owner

The owner of this policy is the Chief Human Resources Officer.

6. Review

This Policy shall be reviewed annually by the Board.

7. Definitions

7.1 'Sexual Harassment' may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature and includes (i) physical contact and advances; (ii) a demand or request for sexual favors; (iii) sexually colored remarks; (iv) showing pornography; (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature. The following circumstances, amongst others, if it occurs or is present in relation or connected with any act or behavior of Sexual harassment may amount to Sexual harassment: (i) Implied or explicit promise of preferential treatment or of detrimental treatment in employment; or implied or explicit threat of detrimental treatment about present or future employment status; or (iii) Interference with work or creating an intimidating or offensive or hostile work environment; or (iv) Humiliating treatment likely to affect health or safety.

7.2 'Workplace' shall have the meaning assigned to it under applicable law and shall include, without limitation:

- 7.2.1 all offices, branches, establishments, premises, locations and facilities where the AMC conducts its business or operations;
- 7.2.2 any place visited by an employee arising out of, or during the course of, employment, including for meetings, business engagements, client interactions, training programmes, conferences, seminars, events or other work-related activities;
- 7.2.3 any social, business, official or work-related function, gathering or event, whether organised by the AMC or attended in connection with employment, where the conduct, behaviour or communication of individuals may have an impact on the workplace or workplace relationships;
- 7.2.4 business travel, accommodation provided in connection with official travel, transportation arranged or provided by the AMC, off-sites, team outings, workshops, training programmes and similar work-related activities; and
- 7.2.5 digital and virtual workplaces, including official communication channels, collaboration platforms, email, messaging applications, video conferencing platforms, social media interactions connected with work, and any other electronic means used in connection with employment or work-related activities.

7.3 'Employer' shall have the meaning assigned to it under the POSH Act and, for the purposes of this Policy, shall include the person(s) authorized by the Company to discharge the obligations of the Employer under the POSH Act.

- 7.4 'Employee' means a person employed at a Workplace for any work on regular, temporary, ad-hoc or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, 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;
- 7.5 'Service Rules' means the Company's Employee Policy Manual and Service Rules.
- 7.6 'Internal Committee' means a committee constituted as per chapter IV of the policy.
- 7.7 'Aggrieved woman' means a woman of any age, in relation to the workplace whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- 7.8 'Respondent' means a person against whom the Aggrieved Person has made a complaint.
- 7.9 'Sexual Harassment' includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
- Physical contact and advances
 - 7.9.1 A demand or request for sexual favors
 - 7.9.2 Making sexually colored remarks
 - 7.9.3 Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings
 - 7.9.4 Sending unwelcome communication of a sexual nature, through email, letter, mobile technology or any other form of written or electronic communication, exhibiting conduct of a sexual nature
 - 7.9.5 Any other mode or through any technological application
 - 7.9.6 Any other unwelcome physical, verbal or non - verbal conduct of sexual nature.
 - 7.9.7 Inappropriate video calls
 - 7.9.8 Cyber stalking
 - 7.9.9 Repeated unsolicited messages
 - 7.9.10 Social media harassment
 - 7.9.11 Sharing intimate images
 - 7.9.12 Ai-generated sexual content
 - 7.9.13 Recording meetings without consent
 - 7.9.14 Digital workplace misconduct
 - 7.9.15 Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation to or connected with any act or behavior of sexual harassment:
 - 7.9.15.1 Implied or explicit promise of preferential treatment in employment
 - 7.9.15.2 Implied or explicit threat of detrimental treatment in employment
 - 7.9.15.3 Implied or explicit threat about present or future employment status
 - 7.9.15.4 Interfering with work or creating an intimidating or offensive or hostile work environment
 - 7.9.15.5 Humiliating treatment likely to affect health or safety

8. Redressal Body

An appropriate complaint mechanism in the form of "Internal Committee" (IC) with at least one-half of the members (in addition to the Presiding Officer) being women, to be constituted in the AMC for time-bound redressal of the complaint made by the victim. The IC shall comprise of the Presiding officer who shall be a senior level woman employee; two members from the employees committee to cause of women or having

experience in social work/legal field; and an External Advisor (NGOs committed to cause of women or experience in social work), and shall be responsible for (a) Investigating every formal written complaint of sexual harassment; and (b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.

The Internal Committee shall function in a fair, impartial and independent manner while discharging its responsibilities under the POSH Act and this Policy. Considering the geographical presence of the Company across India, the Company may designate local representatives at such offices, branches or locations as may be considered necessary based on employee strength and operational requirements. Such local representatives shall serve as designated points of contact for employees and support the implementation of this Policy, including facilitating awareness and sensitisation initiatives, assisting employees in accessing the complaint mechanism, and providing coordination and administrative support in relation to matters arising under this Policy. Where a complaint arises from a location for which a local representative has been designated, such representative may, subject to compliance with the composition requirements of the POSH Act and the absence of any conflict of interest, participate in the inquiry process as part of the Internal Committee. The members of the Internal Committee and local representatives shall ordinarily hold office for a term of three (3) years. Upon completion of the tenure, members and local representatives may be reappointed or replaced, as considered appropriate by the Company, in accordance with the POSH Act and the Company's approval framework. The CEO shall be authorised to constitute, reconstitute the Internal Committee by appointing, replacing, or removing its members or the local representatives. Details of such appointments shall be placed before the Board of Directors at the subsequent Board Meeting for information. The Company may remove or replace any member of the Internal Committee in accordance with the POSH Act, including where such member ceases to be eligible, incurs a disqualification under applicable law, has a conflict of interest, resigns, ceases employment with the Company or is otherwise unable to effectively discharge the responsibilities of the office. Any resulting vacancy shall be filled in accordance with the POSH Act. The current members of Internal committee are:

Name of IC Members	Role	Contact Details	Email id
Ms. Rashmi Ranade	Presiding Officer	90046 87820	ICAMC@ Bandhanamc.com
Mr. Saranjit Singh	Member	99301 16601	
Mr. Shivram Pandey	Member	98193 25411	
Ms. Neeta Singh	Member	98451 18092	
Dr. Deepa Sharma	External Member	91360 15778	drdeepa@indiahr.co.in

The quorum for inquiry proceedings shall ordinarily be three members, including the Presiding Officer, wherever practicable. Any member having a conflict of interest shall disclose the same and recuse themselves from the proceedings. The Company shall nominate an alternate member for the concerned inquiry.

9. Redressal Mechanism

An employee with a concern relating to sexual harassment may make a formal written complaint to the Internal Committee through the designated email address (ICAMC@Bandhanamc.com) or by approaching any member of the Internal Committee, preferably within three (3) months from the date of the incident or, in the case of a series of incidents, within three (3) months from the date of the last incident. The Internal Committee may, for reasons to be recorded in writing, extend the time limit by a further period not exceeding three (3) months where it is satisfied that circumstances prevented the complainant from filing the complaint within the prescribed period under the POSH Act.

Where the aggrieved woman is unable to make a complaint on account of physical or mental incapacity or otherwise, the complaint may be made by a person authorised under the POSH Act. Where an employee initially reports an incident verbally to a manager, Human Resources representative or any other authorised person, reasonable assistance shall be provided to enable the complainant to submit a written complaint to the Internal Committee.

Anonymous complaints may be reviewed by the Company or the Internal Committee to determine whether preventive, awareness-based or administrative intervention is warranted. However, a formal inquiry under this Policy shall ordinarily require an identifiable complainant unless otherwise permitted under applicable law.

Before initiating an inquiry, the Internal Committee may, at the written request of the complainant, take steps to settle the matter between the complainant and the respondent through conciliation. No monetary settlement shall form the basis of conciliation. Where a settlement is arrived at, the Internal Committee shall record the terms of settlement, provide copies to the complainant and the respondent, and forward the settlement to the Management for implementation of the agreed actions. No further inquiry shall be conducted unless the respondent fails to comply with the terms of settlement.

Where conciliation is not requested, no settlement is reached, or the respondent fails to comply with the terms of settlement, the Internal Committee shall conduct an inquiry in accordance with the POSH Act and the principles of natural justice. Both parties shall be provided a reasonable opportunity to present their case, produce supporting documents, identify witnesses and respond to the material placed before the Internal Committee. A copy of the complaint and supporting documents shall ordinarily be shared with the respondent within seven (7) working days of receipt of the complaint. The respondent shall submit a written response together with supporting documents, if any, within ten (10) working days of receipt of the complaint.

The Internal Committee may examine documents, electronic records, witnesses and any other relevant evidence considered necessary for the inquiry. No legal practitioner shall be permitted to represent either party during the proceedings before the Internal Committee.

During the pendency of the inquiry, the complainant may submit a written request seeking interim relief. Based on the facts and circumstances of the case, the Internal Committee may recommend appropriate interim measures to the Employer, including transfer of either party, change in reporting relationship or work allocation, change in seating arrangements, temporary work-from-home arrangements where feasible, restriction of interaction between the parties, leave to the complainant in accordance with the POSH Act, or any other measure necessary to ensure a safe and non-retaliatory work environment.

The Internal Committee shall conduct such investigations in a timely manner, in accordance with the provisions of the Act and shall submit a written report containing the findings and recommendations to the Management, as soon as practically possible and in any case not later than ninety (90) days from the date of receipt of the complaint. Upon completion of the inquiry, the Internal Committee shall submit a written report containing its findings and recommendations to the Employer. The findings of the Internal Committee shall be based on the principle of preponderance of probabilities.

Where the allegations are substantiated, the Internal Committee may recommend such disciplinary, corrective or remedial action as it considers appropriate in accordance with the POSH Act, applicable law and the Company's Conduct and Discipline Rules. Such action may include, without limitation, a written warning, apology, counselling, withholding of promotion or increment, reassignment of duties, suspension, termination of employment, payment of compensation in accordance with the POSH Act, or any other action considered appropriate in the circumstances.

Where the allegations are not substantiated, the Internal Committee may recommend closure of the matter or such other action as it considers appropriate based on the facts and circumstances of the case.

Where the respondent is a customer, vendor, consultant, contractor, service provider, visitor or any other third party, the Company may take such contractual, administrative, commercial or legal action as it considers appropriate, including restricting access to its premises, reporting the matter to the respondent's employer or principal organisation, terminating business relationships or initiating proceedings under applicable law.

Any attempt to influence witnesses, interfere with the inquiry process, tamper with evidence, provide false information, breach confidentiality or otherwise obstruct proceedings under this Policy may constitute misconduct and may result in disciplinary action independent of the outcome of the complaint.

10. Documents

11. The Internal Committee shall maintain complete, accurate and confidential records relating to complaints received, inquiry proceedings, evidence examined, findings, recommendations and actions taken under this Policy in accordance with the provisions of the POSH Act and the Company's record retention requirements.**Confidentiality**

The identity of the complainant, the respondent and witnesses, the contents of the complaint, documents and evidence produced during the inquiry, the proceedings of the Internal Committee, its recommendations and the action taken by the Employer shall be treated as confidential and shall not be disclosed except where such disclosure is required under applicable law or is necessary for implementing the recommendations of the Internal Committee. , The IC shall ensure that the complainant or the witness are not victimized or discriminated against by the accused. All people associated with the proceedings,

including the complainant, respondent, witnesses, Internal Committee members, Human Resources and management representatives, shall maintain confidentiality throughout and after the conclusion of the proceedings. Any breach of confidentiality may result in disciplinary action in accordance with the POSH Act and the Company's applicable policies.

12. Malicious Complaints

This Policy is intended to provide a fair and impartial mechanism for addressing complaints of sexual harassment. Where, upon completion of an inquiry, the Internal Committee concludes that a complaint has been made with malicious intent, or that the complainant has knowingly made a false allegation or produced forged or misleading evidence, it may recommend appropriate action in accordance with the POSH Act and the Company's Conduct and Discipline Rules. A complaint shall not be considered malicious merely because it could not be substantiated, sufficient evidence was not available, or the complainant withdraws the complaint. Before recommending any action in respect of a malicious complaint, the Internal Committee shall provide the concerned individual with a reasonable opportunity of being heard.

13. Appeal

Any person aggrieved by the recommendations of the Internal Committee or by the action taken or non-implementation thereof may prefer an appeal in accordance with the provisions of the POSH Act and other applicable laws, within the timelines prescribed under such laws.

14. Protection Against Retaliation

The Company prohibits retaliation in any form against any person who, in good faith, raises a concern, files a complaint, participates in an inquiry, provides information or evidence, or acts as a witness. Any act of retaliation, victimization, intimidation or adverse employment action arising from participation in proceedings under this Policy shall constitute misconduct and may attract disciplinary action in accordance with the Company's Conduct and Discipline Rules. Retaliation includes, without limitation, intimidation, threats, victimisation, adverse performance assessments, denial of opportunities, exclusion from work-related activities, transfer, demotion, harassment, social ostracisation or any adverse employment action arising from participation in proceedings under this Policy.

15. Awareness

The Company shall communicate this Policy to all employees, include awareness of this Policy as part of employee induction, conduct periodic awareness and sensitization programmes, organize orientation and capacity-building programmes for members of the Internal Committee, display statutory notices relating to the Internal Committee as required under the POSH Act, and maintain a safe working environment free from sexual harassment. Any office which has a local representative, will have the name of the local representative displayed along with the members of the Internal Committee.

16. Annual Reporting

The Internal Committee shall prepare and submit its Annual Report in accordance with the POSH Act and applicable legal requirements. The report may include such particulars as may be prescribed under law,

including the number of complaints received, disposed of and pending, actions taken, awareness programmes conducted and such other information as may be required.

17. Annexure

FORM FOR COMPLAINT

Date: _____

Details of Aggrieved Person / victim(s):

Name: _____

Designation: _____

Address: _____

Contact: _____

E-mail ID _____

Details of Respondent(s):

Name: _____

Designation: _____

Complaint: _____

Signature of Aggrieved Person: _____