



APAC FINANCIAL SERVICES PRIVATE LIMITED
(APAC)

The Policy on the Prevention of Sexual Harassment at Workplace.

Approval Date: January 23, 2026

Owner & Prepared By			
Name	Designation	Date	Signature
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Approved by the Board of Directors on:			
Name	Designation	Date	Signature
Gunit Chadha	Managing Director		
Shankar Dey	Executive Director		

1. Policy

- a) APAC Financial Services Private Limited ("**APAC**" or "**Company**") is an equal opportunity employer and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. APAC also believes that all its employees have the right to be treated with dignity. Sexual Harassment at the workplace or other than the workplace, if involving employees, is a grave offence and is, therefore, punishable.
- b) The Prevention of Sexual Harassment at Workplace Act -2013 read along with the Sexual Harassment of Women at Workplace Rules, 2013 ("**POSH Act**") has been enacted with the objective of preventing and protecting women against workplace sexual harassment and ensuring effective redressal of complaints of sexual harassment. The statute aims at providing every woman (irrespective of her age or employment status) with a safe, secure, and dignified working environment, free from all forms of harassment, and the same has been enacted by the Parliament of India.
- c) For the purpose of this Policy and the functioning of the Internal Committee constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the term 'aggrieved woman' shall have the meaning assigned to it under the Act.
- d) Complaints under this Policy shall be maintainable when made by an aggrieved woman as defined under the Act..
- e) The POSH Act has the provision of establishing committees to assist the aggrieved women or the victims of sexual harassment. The purpose of this policy is to address the complaints of sexual harassment and assist the victims to protect their dignity in the workplace.

2. Scope

This Policy extends to all Directors, Employees of APAC & any person employed at the workplace for any work on a regular, temporary, ad hoc, or daily wage 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 voluntarily 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.

The law includes any place visited by the employee as a workplace, as long as it arises out of or during the course of employment, including accommodation and transportation provided by the employer.

Sexual harassment would mean and include any of the following:

- a) Unwelcome sexual advances, requests, or demands for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination, or evaluation of a person towards any activity of the Company.
- b) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal, or non-verbal communication which offends the individual's sensibilities and affects her/his performance.
- c) Eve teasing, innuendos and taunts, physical confinement against one's will, and likely to intrude upon one's privacy.
- d) Act or conduct by a person in authority which creates an environment at the workplace which is hostile or intimidating to a person belonging to the other sex.

- e) Conduct of such an act at the workplace or outside in relation to a third-party contract employee during employment; and
- f) Any unwelcome gesture by an employee having sexual overtones.

Further, the following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

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

3. Internal Committee

A 4-member Prevention of Sexual harassment committee ("Internal Committee" or "IC" or "the Committee") has been constituted to consider and redress complaints of sexual harassment. The presiding officer and members of the Committee shall be informed to Employees. The members along with the presiding officer, shall not occupy the office for a period of more than three years from the date of nomination.

One member from amongst the non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least one-half of the total members of the Internal Committee shall be women at all times, in compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and at least two other members, one of whom shall be a lady.

The Committee may recommend to the Management of APAC action, which may include appropriate disciplinary action including but not limited to possible suspension or termination. Management shall mean the Management Committee (MANCOM).

Upon written request by the aggrieved woman, the Company shall provide reasonable assistance in filing a complaint with the appropriate authorities.

In case the Committee finds the degree of offence coverable under the Indian Penal Code, the aggrieved woman shall be informed about any such offense and she shall be guided about her rights to take legal actions and/or recourse including initiating criminal proceedings, etc by the Committee and then this fact shall be mentioned in Committee's report and appropriate action may be initiated by the Management of APAC for making a police complaint.

At the end of each financial year, the Committee shall submit a report on all complaints and their status to the board of the Company.

The Committee shall prepare an annual report with details on the number of cases filed and disposal of the same and submit the same to the District Officer.

Powers of the “Internal Committee”

The IC has the same powers as vested in a civil court under the Code of Civil Procedure.

- I. Summoning and enforcing the attendance of any person and examining him on oath.
- II. Requiring the discovery and production of documents; and
- III. Any other matter which may be prescribed.

POSH Committee for APAC

Name	Role	Email ID
Priyanka Nanekar	Presiding Officer	priyanka.nanekar@apacfin.com
Divya Karad	Member	divya.karad@apacfin.com
Prashant Hegde	Member	prashant.hegde@apacfin.com
Samta Ahuja	External Member	samta@corpplace.com

The committee can be reconstituted with the approval of Chief People Officer.

4. Redressal Process and Preliminary Investigation

Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within three months of the occurrence of such incident(s).

Before initiating an inquiry, the Internal Committee may, at the written request of the aggrieved woman, take steps to settle the matter between the aggrieved woman and the respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.

Where a settlement has been arrived at, the Internal Committee shall record the settlement and forward the same to the Management for appropriate action. No further inquiry shall be conducted by the Committee once a settlement has been arrived at.

The Committee will maintain records to support the complaint received by it. The Committee shall follow principles of natural justice and fairness in all its proceedings and the identity and addresses of the Complainant, Respondent and Witnesses, any information relating to inquiry proceedings, recommendations of the Committee, and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner. Any person contravening the confidentiality clauses will be subject to disciplinary action as prescribed in the Act and internal policy of the Company. However, the information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

The Committee will hold a meeting with the complainant within five days of receipt of the complaint, but no later than a week in any case.

At the first meeting, the Committee members shall hear the complainant and record allegations made by the complainant. The complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate his / her complaint. It is important for the Complainant to understand that even though the process is confidential, the Respondent will be informed of the Complainant and any Witnesses and persons directly involved in the complaint process will also learn of the Complainant's identity. The Committee shall be responsible to make the Complainant aware of the same.

Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee by issuing a notice and an opportunity will be given to him/her to give an explanation. If the explanation given is found to be unsatisfactory the concerned staff member shall be issued a charge-

sheet cum notice of enquiry whereafter an enquiry shall be conducted and concluded.

The inquiry into the complaint shall be conducted by the Internal Committee itself in accordance with the provisions of the POSH Act and the rules framed thereunder.

The Committee may, if required, seek assistance from subject-matter experts or legal advisors, provided that such persons shall not have any decision-making authority in the inquiry process.

In the event, that the complaint does not fall under the purview of sexual harassment, or the complaint does not constitute an offence of sexual harassment in the opinion of the Committee, the same would be dropped after recording the reasons therefor.

If the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious, or that the aggrieved woman has made the complaint knowing it to be false, or has produced any forged or misleading document, it may recommend to the Management to take appropriate action against the aggrieved woman in accordance with applicable service rules.

Mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.

The complainant and respondent should not involve any legal practitioner in the inquiry procedure. However, they can be represented by any person permitted under the POSH Act and the rules and regulations made thereunder. Both parties will have the right to bring their evidence and cross-examine the opponent's evidence.

APAC shall provide all necessary assistance to ensure full, effective, and speedy implementation of this policy.

Where sexual harassment occurs because of an act or omission by any third party or outsider, APAC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

All individuals who are part of the Committee's inquiry will need to sign a confidentiality undertaking, if required. The format of which will be decided upon by the Committee.

5. Enquiry Process

The Committee shall proceed with the enquiry and communicate the same to the complainant and respondent, the person against whom the complaint has been made.

The Committee shall hand over a statement of allegation received from the Complainant to the person against whom the complaint is made and allow him/her to submit a written explanation if she/he so desires within 7 days of receipt of the same.

The complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.

If the complainant or the person against whom the complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of the witness/es whom they propose to call.

If the complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the Committee, he/she shall supply original copies of such documents. Both shall affix their respective signatures on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both parties.

The Committee shall provide every reasonable opportunity to the complainant and to the person against whom the complaint is made, for putting forward and defending their respective cases. The Committee shall complete the enquiry within a reasonable period not exceeding three months and communicate its findings and its recommendations for disciplinary action to the Management of APAC.

The report of the Committee shall be treated as an enquiry report based on which an erring employee can be awarded appropriate punishment.

The Internal Committee shall complete the inquiry within a period of ninety (90) days from the date of receipt of the complaint.

The inquiry report shall be submitted to the Management and the parties concerned within ten (10) days of completion of the inquiry.

The Management shall act upon the recommendations of the Internal Committee within sixty (60) days of receipt of the inquiry report.

The Management of APAC will direct appropriate action as per the recommendations proposed by the Committee.

Any person aggrieved by the recommendations of the Internal Committee or the action taken by the Management may prefer an appeal to the Appellate Authority in accordance with the applicable service rules or statutory provisions, within a period of ninety (90) days of such recommendations or action.

Appellate Authority means the following officials of the Company (i) Chief People Officer (ii) Chief Executive Officer and (iii) Chief Compliance Officer and General Counsel of the Company.

The Committee shall be governed by the POSH Act and Rules and Regulations framed thereunder and other applicable legislations/orders of courts.

Training & Awareness

The Company shall organize regular awareness programs and training sessions for employees and members of the Internal Committee to sensitize them to the provisions of the POSH Act.

The details of the Internal Committee and penal consequences of sexual harassment shall be displayed conspicuously at the workplace and communicated to employees through appropriate means.

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