

**Prevention of
Sexual Harassment
(POSH) Policy**



Release date	30 March 2017
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Distribution	All Employees and Partners
Reviewed by	Ashley Menezes

Amendment Sheet

Sr. No.	Date	Revision Status	Reason for Amendment
1.	30 March 2017	Initial Release	NA
2.	October 2024	Amendment	Refreshed Policy

I. Objective:

1. ChrysCapital (hereinafter referred to as "The Firm" or "The Group"), is committed to ensuring all employees are treated fairly and equitably in an environment free of intimidation, gender-based discrimination and harassment. In furtherance of this commitment, the Firm strives to provide all its employees with equal opportunity conditions of employment, free from gender-based coercion, exploitation and harassment and to create a work environment where everyone has an opportunity to fully participate in achieving business success and is valued for the distinctive skills, experiences and perspectives they bring to the workplace.
2. The Firm has zero tolerance for harassment, intimidation, or humiliation of a sexual or gender-based nature in its workplace and is dedicated to ensuring enactment, observance, and adherence to guidelines and best practices that prevent and prosecute acts of Sexual Harassment.
3. The policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.
4. All Complaints of Sexual Harassment will be treated seriously and promptly, with due regard to confidentiality. Ignorance of this policy shall not be considered as an excuse. Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values. We provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

II. Scope:

This is a gender-agnostic company policy and is applicable to all categories of employees, whether permanent or on contract, and at their workplace or at client sites. All complaints will be dealt with, in a just and fair manner and may have serious consequences. The Firm will not tolerate any form of sexual harassment engaged in by clients, employees, consultants, suppliers, or any other business associates and is committed to taking all necessary steps to ensure the safety and well-being of all employees and associates.

This Policy shall extend to:

1. All offices or other premises where ChrysCapital's business activities are conducted across all entities.
2. All ChrysCapital related activities performed at any other site away from ChrysCapital's premises.
3. All employees, whether in the office premises or outside while on official assignment.
4. Incidents of Sexual Harassment reported by a ChrysCapital employee because of an act by a third party or outsider while the former is on official duty.
5. Any other aspect as required by law.

ChrysCapital will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action. While the key aspect of the Act is captured in this POSH Policy, the provisions of the Act shall apply and override the POSH Policy where there is a conflict if any.

III. Definitions:

Apex refers to our Partner group. The role of Apex will include:

1. Formation of the IC as per the requirements of law.
2. Monitoring of feedback on functioning with fair and just redressal mechanism.

The Apex cannot reverse the order or act as an appellate authority.

Complainant refers to an individual filing the complaint. In a situation where the allegations of sexual harassment are made by a third party against an employee of the Firm, the Firm will work to ensure a fair and unbiased inquiry process and take action against the employee accordingly.

Complaint means information, either oral or written, made by the Complainant. However, a complaint made orally must be reduced in writing with the assistance of the Internal Complaint Committee members.

Employee for the purpose of this Policy, means and includes any person hired by ChrysCapital, whether as a consultant or as an employee on the rolls of ChrysCapital who is employed for any work on regular, temporary, ad-hoc or daily wage basis, directly or through an agent, including a contractor, with or without the knowledge of ChrysCapital's management, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, intern, apprentice, article clerk or called by any other such name.

Hostile Work Environment refers to a work environment when unwelcome physical, verbal, gestural behaviour or any written, visual or graphic representations focusing on sexuality is present to interfere with the victim's work performance or be intimidating or offensive to a reasonable person. e. g. certain sexist remarks, display of pornography or sexist or obscene graffiti, physical advances and brushing against any employee.

Internal Complaints Committee (IC): The Firm has instituted an Internal Complaints Committee (hereinafter referred to as the IC or Committee) for redressal of sexual harassment complaints and for ensuring unbiased and time-bound resolution of complaints following the regulations laid down by the Act. (Annexure A). The IC is responsible for conducting an inquiry into every formal written complaint of sexual harassment and making recommendations to the Firm on the actions to be taken against the respondent.

The IC is constituted, in accordance with the provision of Section 4 of the Act, to redress Complaints of Sexual Harassment.

Accordingly, the IC consists of:

1. A Presiding Officer who shall be a woman employed at senior level.
2. Not less than two Members from amongst the Employees preferably committed to the cause of women.
3. One Member from an NGO or association committed to the cause of women or person familiar with the issues relating to the Sexual Harassment e.g. an Advocate.

At least 50% of the IC members should be of any gender other than the majority in the workplace. The Presiding Officer and Members shall hold office for a period that is not in violation of the Act. An order constituting the IC shall be passed and shall be displayed at any conspicuous place of ChrysCapital offices in India.

Quid pro quo refers to sexual favours 'in exchange' of promotion, bonus, perquisites, increment, etc.

Respondent refers to an individual against whose actions a complaint has been filed. In a situation where a complaint is made against a third party, the Firm will be working with the direct employer of the alleged offender to decide the course of action for redressal of the complaint.

Sexual Harassment: includes any unwelcome act or behaviour (whether directly or by implication), such as:

Any unwanted, unwelcome or uninvited behaviour of a sexual nature, which makes a person feel humiliated, intimidated or offended. Sexual Harassment can take many different forms and may include physical contact and advances, verbal comments, jokes, propositions, the displaying of offensive material, a demand or request for sexual favours or other behaviour, which creates a sexually tense or hostile working environment. These will include:

1. Physical contact and advances.
2. A demand or request for sexual favours.
3. Making sexually coloured remarks.
4. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
5. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;

6. Giving gifts or leaving objects that are suggestive or objectionable;
7. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
8. Persistent watching, following, contacting of a person;
9. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature; and
10. Any form of virtual communication that is sexual or inappropriate in nature.

Additionally, the following circumstances if occurring or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment:

1. Implied or explicit promise of preferential treatment in employment.
2. Implied or explicit threat of detrimental treatment in employment.
3. Implied or explicit threat about present or future employment status.
4. Interference with work or creating an intimidating, offensive, or hostile work environment.
5. Humiliating treatment likely to affect health or safety.

Witness is any individual or individuals who have been called upon by either the complainant, respondent, or IC to report their statements as a part of the inquiry proceedings.

Workplace: In addition to the place of work (office) it shall also include any place which employees visit in connection with their, or during the course of and/or arising out of employment/contract/engagement with the Firm, including transportation provided for undertaking such a journey.

Workplace also includes:

1. Any other site away from the Firm's premises where firm-related activities are performed (For example: off-sites, Portfolio Company visits with colleagues, or venues where Firm events, training sessions are being conducted);
2. All work-from-home and virtual communications inclusive of telecommunications and online virtual meetings, emails, or communications that are conducted or shared via any virtual platforms.
3. Employees working from remote locations, or even from home and if there are any Complaints from either an employee working from home to an employee in office or vice-versa, the IC proceedings will accordingly be conducted online as well upon the discretion of the Internal Complaints Committee itself.

IV. Third Party Harassment:

Third-Party Harassment means Sexual Harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom the Employees have come in contact, directly or indirectly, because of the Firm having a relationship/business relationship with them. Where Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, the organization shall take all steps necessary and reasonable to assist the affected employee in terms of support and preventive action

V. Procedures for Resolution, Settlement, or Prosecution of Acts of Sexual Harassment:

1. Written Complaint:

When an incident of Sexual Harassment occurs, a Complainant may make a written complaint to the Presiding Officer or any member of the IC. The Complainant can file a physical copy of the complaint through a sealed envelope or send it through an email to their IC members or specifically to the Presiding Officer.

The complaint should be in writing and clearly include:

- a) The identity, and designation of the Complainant and the identity of the Respondent against whom the complaint is being lodged;
- b) The dates, time, and location of the incident or incidents, since these are useful for speedy redressal;
- c) The identities, designation, and contact information of any other employee who may have witnessed the incident (if any);
- d) Other relevant documented evidence (if available); and
- e) The Complaint should be made, preferably no later than three months from the date of the incident. If the incidents are continuous or have occurred more than once, then the complaint should be made within three months of the most recent incident. The period of three months for filing the written Complaint may be extended by the IC at its sole discretion for an additional period of three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing of the Complaint within the initial period of three months. The reasons for an extension will be recorded in writing by the IC in its final report.

The Presiding Officer or any Member of IC may also render reasonable assistance to the Complainant for making any Complaint in writing if the Complainant cannot make the Complaint in writing themselves.

2. Initial IC meeting:

The IC will hold a meeting with the Complainant, as soon as practicable, but no later than within 7 days from date of receipt of the Complaint. At this meeting, the IC shall hear the Complainant, record the allegations, and encourage the Complainant to submit any corroborative material with documentary proof, oral or written material, etc. to substantiate the complaint if available.

3. Statement of Allegations to Respondent:

Within seven working days from the date of the complaint, the IC shall forward a copy of the Complaint or a statement of allegations to the Respondent and give the Respondent an opportunity to submit a written explanation.

4. Written Response from Respondent:

The Respondent will receive a copy of the Complaint within seven working days of the Complaint

being lodged with the IC. The Respondent will have an opportunity to submit a written response, along with a list of witnesses, dates, and events, if any, to the IC or make an oral representation in response to the contents of the Complaint within ten working days of receipt of the Complaint.

5. IC Jurisdiction:

In the event the IC concludes that prima facie the allegations in the Complaint do not fall within the purview of Sexual Harassment, the IC will forward the complaint to the HR Department or any appropriate Committee within the Company having jurisdiction to inquire into the Complaint to investigate into the complaint in accordance with applicable Firm policies and procedures. Once the Complaint has been filed, any of the below courses of action may be taken:

6. Conciliation:

- a) The Complainant can request for conciliation before the commencement of an inquiry by the IC. Such conciliation can only be requested by the Complainant (and not the Respondent).
- b) The IC shall then record the settlement (Settlement Agreement) so arrived and forward the same to the Apex to take action as specified in the recommendation.
- c) The IC shall provide copies of the settlement to the Complainant and the Respondent.
- d) Where a settlement is arrived at, under conciliation, no further inquiry shall be conducted by the IC.
- e) The possible corrective action in Conciliation includes a verbal/written warning, counselling, or a training workshop. Under the conciliation process, compensation cannot be granted to the Complainant.
- f) The IC will maintain documentation of Complaints that have been addressed through conciliation.
- g) The documentation handled by the IC pertaining to the proceedings through inquiry or conciliation, will be handled with the utmost confidentiality. The Complainant, the Respondent, and any other person involved in these proceedings will also be expected to maintain confidentiality regarding the proceedings and will be asked to sign non-disclosure agreements.

7. Inquiry and Action:

- a) In case the conciliation fails, or the Complainant does not request for conciliation, or the Respondent fails to comply with the terms and conditions of the Settlement Agreement, the IC shall commence inquiry forthwith.
- b) The Respondent must file their response to the Complaint along with supporting documents and names and addresses of witnesses, within ten (10) days of receiving the Complaint copy from the IC. A copy of the said response shall be provided to the Complainant forthwith.
- c) The IC will make an inquiry into the Complaint in accordance with the principles of natural justice.
- d) During the pendency of an inquiry, the IC may, on the request made by the Complainant, grant interim relief in accordance with the provision of section 12 of the Act. These can be as follows:

- i) Arrange for the Complainant to work from home for up to 3 (three) months.
 - ii) The transfer of the Complainant or the Respondent to another Workplace.
 - iii) Grant of leave to the Complainant for a period of up to three months;
 - iv) Note: In the event that the Complainant is granted leave in accordance with this Policy, such leaves shall be in addition to the leaves the Complainant is otherwise entitled to.
 - v) Restraint on the Respondent from reporting on the work performance of the Complainant, or from writing their confidential report, and assigning the said task to another officer.
 - vi) Such other relief to the Complainant as may be prescribed in the rules. This relief is not limited to the Complainant, but the IC may at its discretion also extend an appropriate interim relief to the witnesses involved in the proceedings.
 - vii) The Employer shall implement such recommendations and send a report of such implementation to the IC.
- e) The IC will give both the Complainant and the Respondent an opportunity of being heard at the time of inquiry, and will make available to both of them, a copy of its findings enabling them to make representation in respect of such findings, before the IC.
 - f) The IC may terminate the inquiry proceedings or decide ex-parte on the Complaint, if the Complainant or the Respondent does not, without sufficient cause, present himself/herself for three consecutive hearings convened by the IC.
 - g) The quorum for convening a meeting of the ICC for the purpose of any inquiry shall be three (3) members of the IC, including the Presiding Officer.
 - h) The IC shall complete the inquiry within a period of ninety (90) days and communicate its findings and its recommendations for action to the LLP's management in a report, within ten (10) days of completing the inquiry.
 - i) A copy of the report shall also be made available to the Complainant and the Respondent.
 - j) Attendance at an inquiry hearing: The IC will provide a reasonable opportunity of being heard by both the Complainant and the Respondent. Both the Respondent and the Complainant (unless specifically exempted by the IC in writing) shall be required to attend every hearing that they have been called for. If either party fails to attend three consecutive hearings without sufficient cause, the IC may terminate the inquiry or pass an ex-parte order with fifteen (15) days' notice to the concerned party.
 - k) Summoning Witnesses: While conducting the inquiry, the IC may call upon such Witnesses as it may deem appropriate. The Complainant and the Respondent will have the right to submit a list of Witnesses.
 - l) Withdrawal: Withdrawal of the Complaint made or filed at any stage of the proceedings shall not preclude the IC from proceeding with the investigation of the Complaint.
 - m) The report of the IC shall be treated as a final report based on which the Respondent can be awarded appropriate punishment within sixty (60) days of its receipt. In the event the IC concludes that allegations of Sexual Harassment have been established, it shall in its report to ChrysCapital, recommend the action to be taken against the Respondent and/or deduct such sum as it considers appropriate from the salary/wages of the Respondent to be paid

to the Complainant or their heirs (in case of death) or any other act in accordance with the provision of the Act. While arriving at the appropriate compensation sum to be paid to the Complainant, the IC shall have regard to the considerations set out in Section 15 of the Act. The management will take appropriate action in accordance with the recommendation proposed by the IC.

- n) In case, the IC finds the degree of offence to be covered under the Indian Penal Code, then this fact shall be mentioned in its report and if required appropriate action shall be initiated by the Apex or on the request of the Complainant, for making a Police complaint.
- o) In the event, the Complaint does not fall under the purview of Sexual Harassment, or the allegations are not established, the IC shall recommend to ChrysCapital that no action is required to be taken and close the enquiry by recording reasons in writing.
- p) None of the parties can be represented by a lawyer during the proceedings.
- q) The IC shall be governed by the Act and the Rules.
- r) Where the IC arrives at the conclusion that the allegation against the Respondent has been proven, it shall recommend to the Firm.
 - i) To take action for Sexual Harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent or where no such service rules have been made, action may include:
 - Disciplinary action, including a written apology, reprimand, warning, censure;
 - Withholding promotion/pay raise/increments/bonus;
 - Termination; and/or
 - Counselling.
 - ii) to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent or to pay such sum as it may consider appropriate to be paid to the Complainant or to his/her/their legal heirs.

VI. Appeal:

Any person aggrieved by the recommendations or non-implementation of the recommendations made by the IC, may refer an appeal to the Apex and subsequently to the appellate authority appointed by the appropriate government within ninety (90) days of the recommendations.

VII. Annual Report:

The IC shall submit in each calendar year an Annual Report which contains number of cases received, disposed, pending for more than ninety (90) days, number of workshops against sexual harassment carried out and nature of action taken by ChrysCapital and the District Officer.

VIII. False Complaint/Evidence:

1. Duty of good faith

- a) An employee of ChrysCapital is liable to sanction/action in accordance with the provision of Section 14 of the Act for knowingly or recklessly bringing a false Complaint of Sexual Harassment and false evidence.
- b) If on an inquiry, the Complaint is found to be false or malicious, or that a witness has given misleading evidence, the Complainant or the witness, as the case may be, shall be liable for appropriate disciplinary action as recommended by the IC. Such malicious intent must be established during the inquiry.
- c) A mere inability or insufficiency to substantiate a Complaint shall not be considered as grounds for taking action as false or malicious complaint.

2. Non-retaliation

No person shall be subject to harassment, intimidation, or retaliation of any kind for having brought a good faith Complaint of prohibited harassment.

IX. Compensation:

The purpose of compensation is to put the Complainant in the same position as they were had the harassment not occurred. It is the Respondent who shall be liable to make good the financial loss suffered by the Complainant and not the employer.

In addition to disciplinary action recommended, the IC is empowered to recommend monetary compensation to the Complainant, factoring in the income and financial status of the Respondent, in the following cases:

1. Mental trauma, pain, suffering, and emotional distress;
2. Loss in career opportunity;
3. Medical expenses (physical and psychiatric).

The compensation amount will be paid in a lump sum or instalments.

X. Confidentiality:

The Firm understands that it is difficult for an employee to come forward with a Complaint of Sexual Harassment and recognizes their interest in keeping the matter confidential. Any and all persons entrusted with the duty to handle or deal with a Complaint, inquiry or any recommendation or action to be taken under the Act, Rules and this POSH Policy shall not disclose the name, address, identity or any other particulars that can in any way reveal the identity of the Complainant and the Witnesses or the Respondent to anyone including public or media. In case of any violation, the concerned person shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed by law.

XI. Revision and Term of the Code and POSH Policy:

This POSH Policy shall be reviewed periodically and, in any case, at least once in two years, or as and when there are any amendments to the Act or Rules, whichever is earlier to ensure compliance with legal requirements and effectiveness in preventing sexual harassment at the workplace.

XII. Contact Details of Key Persons:

Names of the members of the IC, along with their contact details are provided in the order constituting the IC. ChrysCapital will periodically update and communicate the list of names and contact details of the IC members.

XIII. ChrysCapital's Responsibilities:

1. We have a zero-tolerance approach against Sexual Harassment and will continue to communicate the same.
2. We will strive to create and maintain a safe working environment where all employees are respected and treated with dignity.
3. We will discuss and display the consequences of Sexual Harassment through regular training and display of our policy at office premises.
4. Provide assistance to the employees if they wish to file a Complaint under the Indian Penal Code.
5. Take appropriate actions in accordance with law by filing Complaints with the right authorities where any conduct that amounts to a specific offence under the Indian Penal Code or any other such penal law prevalent in India at the time.
6. In the event of any visitor(s) engaging in Sexual Harassment or receiving Complaints from employees, assist employees in filing complaints with the appropriate authorities under applicable laws enforced and also assist such employees in distress.
7. Retaliation against Complainant to be dealt with seriously.
8. Respect privacy and maintain confidentiality of all parties involved in inquiry proceedings.

XIV. Employees' Responsibilities:

All employees of the Firm have a personal responsibility to ensure that their behaviour is not contrary to these guidelines. All Employees are encouraged to reinforce the maintenance of a work environment free from Sexual Harassment. Following are the ways in which this can be done:

1. Educate oneself by reading these guideline documents and participate in e-learning and trainings assigned by the Firm or IC.
2. Report incidents of Sexual Harassment to the IC members immediately.
3. Assist in securing the attendance of the Respondent during inquiry proceedings.

4. Make any such information available to the IC during inquiry proceedings.
5. Take reasonable care to not create a hostile work environment through actions or behaviour for co-workers and associates.
6. Take responsibility to call out unwelcome conduct that is offensive or humiliating.
7. Cooperate in the inquiry of proceedings by IC.
8. Maintain confidentiality at all times in the event that you are involved in or have access to information related to any Complaint.
9. All Employees are encouraged to advise others of behaviour that is inappropriate and unacceptable at ChrysCapital. We understand that some behaviours may not be intentional. While this does not make it acceptable, it does not give the person behaving inappropriately, the opportunity to make amends and stop their offensive behaviour.

XV. Role of Managers:

All managers at ChrysCapital must ensure that nobody is subjected to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

1. Create and maintain a work environment where all employees feel safe and respected.
2. Be alert to observe any inappropriate conduct or comments and correct the behaviour through meaningful feedback;
3. Approach the IC in accordance with these guidelines, when instances of Sexual Harassment take place within the workplace;
4. Discuss and display the consequences of sexual harassment at a conspicuous place of the Workplace;
5. Assist in securing the attendance of the Respondent during inquiry proceedings.
6. Make any such information available to the IC during inquiry proceedings.
7. Provide assistance to the Employees if they wish to file a Complaint under the Indian Penal Code.
8. The Firm may take appropriate actions in accordance with law by filing complaints with the right authorities where any conduct that amounts to a specific offence under the Indian Penal Code or any other such penal law prevalent in India at the time.
9. In the event of any visitor(s) engaging in Sexual Harassment or if the Firm receives Complaints from their Employees or consultants, the Firm will assist in filing complaints with the appropriate authorities under applicable laws enforced and the Firm shall also assist such Employees or consultants in distress.
10. Ensure that all team members have undergone the mandatory POSH e-learning and are present for any additional training sessions on the topic.

XVI. Reporting by the IC:

The IC shall prepare an annual report and file it with the Apex & appropriate authorities. The annual report shall contain the following details:

1. Number of complaints received in the year.
2. Number of complaints disposed of during the year.
3. Number of cases pending for more than ninety (90) days.
4. Number of workshops or awareness programs conducted.
5. Nature of action taken by the employer.

Annexure A:

Internal Complaints Committee for the period January 2023 to December 2025:

MUMBAI

Sr. No.	Name	Designation	E-mail ID	Contact No.
1.	Ms. Jagriti Gupta	Presiding Officer	jagriti@chryscapital.com	90046 79565
2.	Ms. Prachi Marwah	Member	prachi@chryscapital.com	99715 15998
3.	Mr. Unmesh Rai	Member	Unmesh@chryscapital.com	98204 61369
4.	Ms. Neha Kedia	External Member	neha@complykaro.com	022 4213 9595

DELHI

Sr. No.	Name	Designation	E-mail ID	Contact No.
1.	Ms. Shilpi Bansal	Presiding Officer	shilpi@chryscapital.com	95824 07928
2.	Ms. Garima Bharti	Member	garima@chryscapital.com	87004 93621
3.	Mr. Akshat Babbar	Member	akshat@chryscapital.com	99204 42313
4.	Ms. Neha Kedia	External Member	neha@complykaro.com	022 4213 9595

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