

Policy on Prevention of Sexual Harassment at Workplace

Sumedha Fiscal Services Ltd.

Policy Review Date: 15/12/2025

1. Objective

Sumedha Fiscal Services Ltd. is committed to creating a safe, respectful, and inclusive workplace for all employees. This policy outlines the framework for preventing, prohibiting, and addressing sexual harassment in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013** ("POSH Act").

2. Scope

This policy applies to:

- All employees, regardless of rank or designation, including permanent, contractual, part-time, and interns.
 - Any individual visiting our premises, such as clients, vendors, or partners.
 - Incidents occurring within or outside the workplace if related to work or workplace relationships.
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3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome acts or behavior (whether direct or by implication) such as:

- Physical contact or advances.
- Demand or request for sexual favors.
- Sexually colored remarks.
- Showing pornography.
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

It also includes any conduct that creates a hostile work environment or impacts an individual's work performance.

4. Responsibilities

1. **Employer's Responsibility:** Ensure a workplace free from sexual harassment and implement this policy effectively.
 2. **Employees' Responsibility:** Avoid any behavior that could be construed as sexual harassment and report incidents promptly.
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5. Internal Committee (IC)

An Internal Committee (IC) shall be constituted as per the POSH Act to address complaints of sexual harassment. The IC will comprise:

- A Presiding Officer (a senior female employee).
- At least two employee members
- One external member

The IC will:

- Receive and address complaints of sexual harassment.
 - Ensure confidentiality and fairness in proceedings.
 - Provide recommendations to the employer on actions to be taken.
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6. Complaint Mechanism

1. **Filing a Complaint:**
 - Complaints must be submitted in writing to the IC within three months of the incident. Extensions may be granted if justified.
 - Complaints can also be sent via email to hrd@sumedhafiscal.com
 2. **Redressal Process:**
 - The IC will conduct an impartial inquiry within 90 days of receiving the complaint.
 - Both parties will have an opportunity to present their case.
 - Confidentiality will be maintained throughout the process.
 3. **Actions Based on Findings:**
 - If the complaint is proven, disciplinary action such as a warning, suspension, or termination will be taken.
 - False or malicious complaints may lead to disciplinary action against the complainant.
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7. Awareness and Training

- Regular workshops and training sessions will be conducted to educate employees on recognizing and preventing sexual harassment.
 - Information about this policy will be displayed prominently in the workplace.
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8. Confidentiality

All complaints, proceedings, and actions under this policy shall remain strictly confidential. Breach of confidentiality by any party may result in disciplinary action.

9. Retaliation

Sumedha Fiscal Services Ltd. prohibits retaliation against anyone reporting an incident of sexual harassment or participating in an investigation. Any act of retaliation will be subject to disciplinary action.

10. Monitoring and Review

The HR department will oversee the implementation of this policy and ensure compliance. The policy will be reviewed periodically to incorporate any legislative updates or organizational needs.

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