



**PRAYAS FINANCIAL SERVICES PRIVATE LIMITED**

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## POSH Policy

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Prayas Financial Services Private Limited  
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## Contents

Glossary of Terms.....	5
List of Abbreviations.....	6
1. Introduction .....	7
2. Objective .....	7
3. Scope of the Policy.....	7
4. Definition of Sexual Harassment/What to report.....	8
5. Applicability .....	8
6. Guidelines .....	8
6.1: Aggrieved Person .....	8
6.1.1: Protection of Aggrieved Person and Witnesses under POSH.....	8
6.1.2 False Allegations and Misuse of the Policy.....	9
6.2: Employees.....	9
6.3: Employer.....	9
6.4: Internal Complaint Committee .....	10
6.41. ICC Committee.....	10
6.5 Responsibilities of the ICC include: .....	10
7. Procedure of filing a Complaint/How to report:.....	<del>11</del> <a href="#">19</a>
7.1 Timeline and Manner of Filing a Complaint .....	11
8. Conciliation Process .....	11
9. Inquiry into the Complaint.....	<del>12</del> <a href="#">14</a>
10. Inquiry Report and Recommendations .....	12
11. Determination of Compensation.....	13
12. Governance and Oversight Provisions .....	13
Annexure -1.....	15

## Glossary of Terms

Term	Definition
<b>Aggrieved Person</b>	A woman, of any age and whether employed or not, who alleges to have been subjected to sexual harassment at the workplace, as defined under the POSH Act.
<b>Employee</b>	Any person working at the workplace, whether full-time, part-time, temporary, contractual, paid or unpaid, including trainees, apprentices, volunteers, or agents.
<b>Internal Complaints Committee (ICC)</b>	The committee constituted under this Policy for the prevention and redressal of sexual harassment complaints.
<b>Investigator(s)</b>	Individual(s) appointed by the ICC to conduct a fair, unbiased, and thorough investigation into the complaint. To minimize bias, it is recommended to appoint two investigators from different departments. The investigation must remain independent of hierarchical or personal influence.
<b>Respondent</b>	The person against whom the complaint of sexual harassment is made.
<b>Sexual Abuse</b>	Actual or threatened physical intrusion of a sexual nature, whether by force or under coercive or unequal conditions.
<b>Sexual Exploitation</b>	Abuse or attempted abuse of power, vulnerability, or trust for sexual purposes, including threats, manipulation, or seeking personal gain.
<b>Workplace</b>	<ul style="list-style-type: none"> <li>(i) any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a government company or a corporation or a co-operative society;</li> <li>(ii) any private sector organization or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organization, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;</li> <li>(iii) hospitals or nursing homes;</li> <li>(iv) any sports institute, stadium, sports complex or competition or games venue, whether residential or not used for training, sports or other activities relating thereto;</li> <li>(v) any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey;</li> <li>(vi) a dwelling place or a house;</li> </ul>

## List of Abbreviations

Abbreviation	Meaning
AFIG	Ananya Finance for Inclusive Growth Pvt. Ltd.
ICC	Internal Complaints Committee
NBFC	Non-Banking Financial Company
POSH	Prevention of Sexual Harassment

## 1. Introduction

Ananya Finance for Inclusive Growth Pvt. Ltd. (AFIG) is a prominent NBFC institution committed to promoting financial inclusion and fostering sustainable economic growth. The organization primarily focuses on providing accessible financial services to underserved communities, with a particular emphasis on empowering women through access to credit. AFIG's lending model is designed to support impact-based financing, ensuring that women in rural and semi-urban areas can access the capital needed to enhance their livelihoods, improve business opportunities, and contribute to the economic development of their communities.

With a strong foundation in ethical and transparent business practices, AFIG ensures that each customer is treated with fairness and respect. AFIG is committed to achieving positive and sustainable outcomes through its services, which include not only financial assistance but also initiatives that enhance financial literacy, promote entrepreneurship, and encourage responsible borrowing. By empowering its clients, particularly women, AFIG seeks to create a more inclusive financial ecosystem and contribute to long-term socio-economic growth in India.

1. With a focus on transparency, integrity, and social responsibility, AFIG is dedicated to making a meaningful difference in the lives of its clients and strengthening the communities it serves. Through its innovative approach, AFIG plays a crucial role in advancing inclusive growth and supporting the development of resilient, self-sufficient communities across India.

## 2. Objective

AFIG is dedicated to fostering a workplace where every individual is treated with dignity, respect, and fairness. The Company upholds the principle of equal opportunity for all employees, regardless of gender, caste, religion, origin, sexual orientation, or any other characteristic unrelated to merit. AFIG is also committed to creating an environment that supports professional growth and promotes inclusivity and equality at all levels.

AFIG maintains a zero-tolerance policy towards sexual harassment in any form. The Company is committed to taking all necessary measures to prevent such conduct and to ensure a safe, respectful, and dignified work environment for women. This Policy reflects that commitment and is in full compliance with the Companies Act, 2013, and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act), which specifically provides protection to women at the workplace.

## 3. Scope of the Policy

This Policy applies to all individuals associated with the Company, including full-time and part-time employees, trainees, and those engaged through contractual assignments. It also extends to clients of the Company. The provisions of this Policy are deemed to be an integral part of the service conditions of all employees. In accordance with the provisions of the POSH Act, the term "sexual harassment" includes any one or more of the following unwelcome acts or behaviors, whether directly or indirectly:

- Sexually motivated physical contact or advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Displaying or sharing pornographic content
- Sexual exploitation
- Sexual abuse

- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

#### **4. Definition of Sexual Harassment/What to report**

“Sexual Harassment” refers to any unwelcome act, conduct, or behaviour of a sexual nature, whether direct or implied, verbal, non-verbal, written, physical, or visual that causes discomfort, humiliation, fear, or a hostile work environment to the aggrieved person. It includes but is not limited to:

- Unwelcome or forceful physical contact
- Unsolicited or unwelcome sexual advances
- A demand or request for sexual favours, either explicit or implicit, in exchange for employment-related benefits such as hiring, promotion, evaluation, or participation in company activities
- Sexually coloured remarks, jokes, insults, or taunts
- Displaying, showing, or sharing pornography or any other explicit content
- Any sexual content communicated through verbal, written, phone, or electronic means such as messages, emails, or calls
- Giving gifts or leaving sexually suggestive objects, messages, or materials
- Persistent watching, following, or attempting to contact a person despite refusal or disinterest (stalking)
- Eve teasing or lewd gestures
- Any other unwelcome physical, verbal, non-verbal, or visual conduct of a sexual nature

The following circumstances, among others, may also constitute sexual harassment if connected to or arising from the above acts:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work performance or creation of an intimidating, hostile, or offensive work environment
- Humiliating treatment likely to affect health or safety

Any act or behaviour that outrages the modesty of an employee or creates a threatening or uncomfortable work environment shall be considered as sexual harassment under this Policy.

#### **5. Applicability**

This policy applies to all employees, vendors, customers, consultants, business partners, interns, and trainees.

#### **6. Guidelines**

##### **6.1: Aggrieved Person**

##### **6.1.1: Protection of Aggrieved Person and Witnesses under POSH**

- This Policy ensures that no women shall face retaliation, victimization, or adverse treatment for lodging a complaint of sexual harassment or for participating in any inquiry as a witness or supporting party.



- The Company is committed to safeguarding the interests of the aggrieved person and any witnesses throughout the investigation process. Any form of intimidation, threat, or discrimination against them shall be treated as a violation of this Policy and shall invite disciplinary action.
- Any employee who experiences or perceives retaliatory action due to their involvement in a POSH complaint may report such action to the Internal Complaints Committee (ICC), which shall take appropriate corrective measures.
- All employees have a responsibility to uphold the principles of dignity and respect in the workplace. Any observed or suspected instance of sexual harassment must be reported promptly to the ICC or designated POSH authority.

#### **6.1.2 False Allegations and Misuse of the Policy**

- If, during the inquiry, the ICC concludes that a complaint was made with malicious intent or that false evidence was deliberately presented, such conduct shall be treated as a serious offence and may attract disciplinary action, up to and including termination of services.
- However, mere inability to substantiate a complaint or provide adequate proof shall not, by itself, be construed as a false allegation.
- The protection under this Policy shall not extend to any employee who abuses the process or makes a complaint with intent to harass the respondent.

### **6.2: Employees**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to guideline mentioned in this policy. It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Refusing to participate in any activity which constitutes harassment
- Supporting the person to reject unwelcome behavior
- Acting as a witness if the person being harassed decides to lodge a complaint

### **6.3: Employer**

To ensure effective implementation of the POSH Policy and compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the employer shall undertake the following responsibilities:

- Ensure a safe, secure, and inclusive working environment for all employees at the workplace, including protection from any third parties or visitors who may be present at the workplace.
- Conduct workshops, awareness sessions, and training programmes at regular intervals to sensitize all employees about the provisions of this Policy and the POSH Act. Orientation programmes shall also be conducted for members of the Internal Complaints Committee (ICC) to build their capacity.
- Provide all necessary facilities and resources to the ICC to effectively manage complaints, conduct inquiries, and carry out its duties without obstruction.
- Facilitate the presence of the respondent and witnesses during the inquiry proceedings as required by the ICC.
- Share all relevant documents, information, or records needed by the ICC to complete a fair and timely inquiry.
- Support the aggrieved person in filing a complaint by offering guidance, access, and assistance as required.

- Recognize sexual harassment as misconduct under the applicable service rules of the Company and ensure that appropriate disciplinary action is taken based on the ICC's recommendations.
- Monitor and ensure the timely submission of reports and updates by the ICC, including the submission of the annual report as mandated by law.

#### **6.4: Internal Complaint Committee**

As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Complaints Committee (ICC) shall, while inquiring into a complaint of sexual harassment at the workplace, exercise powers equivalent to those of a civil court under the Code of Civil Procedure, 1908. These powers include:

- Summoning and enforcing the attendance of any person and examining them on oath
- Requiring the discovery and production of relevant documents
- Any other powers that may be prescribed under applicable rules or notified by competent authorities

##### **6.41. ICC Committee**

<b>Sr. No.</b>	<b>Name of Members of Committee</b>	<b>Designation</b>
1.	Ms. Beena Thakar	Member
2.	Ms. Divya Rathi	Member
3.	Ms. Neeta Hardikar	External Member
4.	Ms. Shrabanti Patel	Presiding Officer
5.	Mr. Amit Garg	Member

#### **6.5 Responsibilities of the ICC include:**

- Receiving and conducting a fair, unbiased, and time-bound inquiry into every formal written complaint of sexual harassment submitted by an aggrieved person
- Taking appropriate and proportionate remedial measures based on the outcome of the inquiry, in accordance with the severity of the misconduct and as per Company disciplinary procedures
- Ensuring that all complaints are handled with utmost confidentiality, sensitivity, and impartiality
- Recommending interim relief measures (if required) to safeguard the interests of the aggrieved person during the pendency of the inquiry
- Making efforts to prevent the recurrence of such incidents by recommending systemic improvements or sensitization measures
- Promoting awareness about this Policy and POSH Act provisions across the organization

The findings and decisions of the ICC shall be considered final and binding on all employees, officers, and Directors of the Company, subject to the right of appeal provided under the Act.

Further, the finding of the ICC committee and subsequent action of the ICC shall be intimated to the Board.

## 7. Procedure of filing a Complaint/How to report:

An aggrieved person who believes they have been subjected to sexual harassment at the workplace is encouraged to report the incident as per the procedure detailed below:

### 7.1 Timeline and Manner of Filing a Complaint

- A complaint should be filed within three months from the date of the incident. In the case of a series of incidents, it should be filed within three months from the date of the last incident.
- The complaint must be submitted in writing to the Internal Complaints Committee (ICC).
- The written complaint may be submitted in any of the following ways:
  - **Email:** Send to **posh@prayasfinance.com**
  - **Postal Mail:** Addressed to  
*Shrabanti Patel*  
*108, 1st Floor, Orchid Business Park, Sector 48, Gurugram - 122018, Haryana, India*
  - **In-Person:** A written complaint may be handed over directly to any ICC member or to any officer authorized by the ICC.

*Note: In case any complaint is raised under POSH then the same shall be intimated to the Board in the meeting held subsequent to complaint.*

### 7.2 Extension of Timeline and Special Circumstances

- The ICC may, for reasons recorded in writing, extend the time limit by up to three additional months, if it is satisfied that there were valid circumstances preventing the aggrieved person from filing the complaint within the prescribed period.
- If the aggrieved person is unable to make a complaint due to physical or mental incapacity, death, or any other reason, the complaint may be filed by any of the following individuals on their behalf:
  - A relative or friend
  - A co-worker
  - A special educator
  - A qualified psychiatrist or psychologist
  - A guardian or authority under whose care the aggrieved person is receiving treatment
  - Any person having knowledge of the incident, jointly with any of the above

## 8. Conciliation Process

Before initiating a formal inquiry, the Internal Complaints Committee (ICC) may, at the written request of the aggrieved person, attempt to resolve the matter between the complainant and the respondent through conciliation.

- Monetary settlement shall not be permitted as a basis of conciliation.
- If a settlement is reached, the ICC shall document the terms of the settlement in writing and forward the same to the employer for implementation as per the ICC's recommendations.
- Copies of the settlement agreement shall be provided to both the complainant and the respondent.
- Once a conciliation-based settlement has been successfully concluded and recorded, no further inquiry shall be initiated by the ICC in relation to the same complaint.

## **9. Inquiry into the Complaint**

Upon receiving a written complaint, the Internal Complaints Committee (ICC) shall initiate a formal inquiry in accordance with the service rules applicable to the Company. The ICC may choose to jointly conduct the investigation by examining the submitted evidence, interviewing the parties and witnesses, and documenting findings collectively. Alternatively, the ICC may appoint an independent investigator to conduct the inquiry on its behalf, who shall work independently and submit a detailed report for the Committee's review and final recommendation.

If the aggrieved person informs the ICC that the respondent has failed to comply with the terms of a conciliation-based settlement, the ICC shall proceed to initiate a formal inquiry into the complaint.

Where both the complainant and the respondent are employees of the Company, the ICC shall ensure the following during the course of the inquiry:

- Both parties shall be given a fair opportunity to be heard.
- A copy of the findings shall be shared with both parties to enable them to submit their representations, if any, before the Committee.

For the purpose of conducting the inquiry, the ICC shall have the powers of a civil court under the Code of Civil Procedure, 1908, in respect of the following matters:

- Summoning and enforcing the attendance of any person and examining them under oath
- Requiring the discovery and production of documents
- Any other matter as may be prescribed under applicable law

The inquiry shall be completed within 90 days from the date of receipt of the complaint.

### **9.1 Interim Relief during Inquiry**

During the pendency of the inquiry, upon a written request from the aggrieved person, the ICC may recommend to the employer any of the following interim measures:

- Transfer of either the aggrieved person or the respondent to another workplace
- Grant of leave up to three months to the aggrieved person, in addition to her regular leave entitlements
- Any other relief deemed appropriate and permissible under applicable law

## **10. Inquiry Report and Recommendations**

Upon completion of the inquiry, the Internal Complaints Committee (ICC) shall prepare a detailed inquiry report containing its findings and submit the same to the employer within ten (10) days from the date of completion of the inquiry.

### **10.1 When Allegations Are Not Proven**

If the ICC concludes that the allegations against the respondent are not substantiated, it shall recommend to the employer that no action is required in the matter.

### **10.2 When Allegations Were Malicious or Intended to Harm Reputation**

If the ICC finds that the complaint was filed with malicious intent or solely to harm the reputation of the respondent, it shall recommend to the employer to take appropriate action against the complainant in accordance with the policy provisions relating to false complaints.

### **10.3 When Allegations Are Proven**

If the ICC concludes that the allegations are proven, it shall recommend to the employer one or more of the following actions:

- Initiate disciplinary action against the respondent for sexual harassment as per the applicable service of the company.
- Deduct from the salary or wages of the respondent an amount as deemed appropriate by the ICC to be paid to the aggrieved person or their legal heir as compensation.

If the respondent is absent from duty or has left employment, making salary deduction impossible, the employer may direct the respondent to make the payment directly to the aggrieved person. In case of non-payment by the respondent, the ICC may forward the recovery order to the concerned District Officer, who shall take necessary steps to recover the amount as an arrear of land revenue.

The employer is obligated to act upon the recommendations of the ICC within sixty (60) days of receiving the final report.

## **11.Determination of Compensation**

In cases where the Internal Complaints Committee (ICC) concludes that sexual harassment has occurred and recommends monetary compensation to the aggrieved person, the ICC shall assess the amount to be paid by the respondent based on the following considerations:

- The mental trauma, emotional distress, pain, and suffering experienced by the aggrieved person as a result of the incident.
- The loss of career opportunities, professional growth, or any adverse impact on the aggrieved person's employment due to the act of sexual harassment.
- Any medical expenses incurred, including those related to physical or psychiatric treatment, arising from the incident.

The ICC shall ensure that the recommended compensation is fair, appropriate, and reflective of the harm and consequences faced by the aggrieved person.

## **12.Governance and Oversight Provisions**

- The Internal Complaints Committee (ICC) shall prepare and submit an annual report to the employer in the prescribed format as referred in Annexure 1. The report shall include the number of complaints received, disposed of, pending, and any recommendations or actions taken.

- The Human Resources Department shall be responsible for monitoring the effective implementation of this Policy and the provisions of the POSH Act. HR shall also maintain updated records on the number of cases filed and disposed of under this Policy.
- Confidentiality shall be strictly maintained throughout the complaint handling process. The identity and address of the aggrieved person, respondent, witnesses, the contents of the complaint, details of conciliation or inquiry proceedings, ICC recommendations, and any action taken shall not be published, communicated, or disclosed to the public, media, or any unauthorized persons. Disclosure is permitted only when expressly required under applicable laws or regulations.
- Any person aggrieved by the recommendations of the ICC may file an appeal as per the provisions of the POSH Act and applicable rules.
- In cases where a complaint is filed against a member of the ICC, the employer shall reconstitute the Committee in accordance with the guidelines of this Policy and the requirements of the POSH Act, ensuring impartiality and due process.
- The Company reserves the right to review, update, or modify this Policy at any time, in line with amendments to the Act, relevant rules, or evolving best practices.

**Annexure - 1**

<b>S. No.</b>	<b>Particulars</b>	<b>Number</b>
1	Number of sexual harassment complaints received during the year	
2	Number of complaints disposed of during the year	
3	Number of cases pending for more than 90 days	
4	Number of workshops or awareness programs conducted on prevention of sexual harassment	
5	Nature of action(s) taken by the employer in cases where harassment was proven	
6	Total number of ICC meetings conducted during the year	