

Prevention of Sexual Harassment (POSH) Policy

Kantilal Chhaganlal Securities Pvt. Ltd.

EFFECTIVE: 01/04/2025

Since 1954



Version: 1.1

Introduction

At Kantilal Chhaganlal Securities Pvt. Ltd., we are committed to providing a workplace that is safe, respectful and free from any form of harassment or discrimination. We recognize that every employee, consultant, trainee, intern, visitor or associate has the right to work in an environment that upholds their dignity and equality.

Sexual harassment is not only a violation of fundamental rights guaranteed under the Constitution of India but also an unacceptable workplace practice that can cause deep emotional, psychological and professional harm.

In compliance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the associated Rules, this policy has been formulated to:

- Prevent incidents of sexual harassment.
- Provide a redressal mechanism that is fair, transparent and confidential.
- Promote a culture of zero tolerance towards harassment and discrimination.

Through this policy, Kantilal Chhaganlal Securities Pvt. Ltd. reiterates its strong stance against sexual harassment and its commitment to fostering a workplace that values equality, inclusivity and mutual respect.

OBJECTIVE:

The objective of this policy is to ensure that **Kantilal Chhaganlal Securities Pvt. Ltd.** provides a safe, respectful, and inclusive workplace that upholds the dignity and equality of every individual.

In line with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and its Rules, this policy aims to:

- **Prevent, prohibit, and redress** any form of sexual harassment at the workplace.
- Establish a **fair, transparent, and confidential mechanism** for the resolution of complaints.
- **Protect the rights of all employees, associates, and stakeholders** to work in an environment free from intimidation, hostility, or discrimination.
- **Promote a culture of zero tolerance** towards harassment and reinforce values of gender equality, inclusivity, and mutual respect.

SCOPE:

This policy applies to all instances of sexual harassment occurring at the workplace, irrespective of the complainant's or respondent's employment status or gender. It covers acts committed:

- Within office premises or branch locations.
- During official events, seminars, workshops, or training sessions, whether on or off-site.
- During work-related travel or in company-provided transportation.
- At client sites or external venues visited for official purposes.
- On virtual or digital communication platforms (emails, calls, messages, video conferencing, etc.) used for official communication.
- In work-from-home or hybrid working arrangements.

COVERAGE:

This policy applies to all individuals associated with **Kantilal Chhaganlal Securities Pvt. Ltd.**, irrespective of their employment status, and covers the following categories of people:

- **Employees:** Permanent, temporary, part-time, ad hoc, or daily-wage staff.
- **Contractual Workers:** Persons employed through contractors or agencies, with or without the knowledge of the company.
- **Interns, Apprentices, and Trainees:** Individuals engaged for learning, training, or skill development.
- **Consultants and Business Associates:** Individuals engaged on assignments or providing services to the company.
- **Vendors and Visitors:** Third-party individuals present on company premises or interacting with employees for official purposes.
- **Any Individual Engaged in Official Activities:** Whether directly employed or not, if connected with the company's business or functions.

DEFINITIONS:

- **Aggrieved Person:** Any person, irrespective of gender, age, designation or employment status (permanent, temporary, contractual, trainee, intern, visitor, etc.), who believes that they have been subjected to an act of sexual harassment, whether directly or indirectly, at the workplace.
- **Employee:** Any individual employed at the workplace for remuneration or otherwise, whether full-time, part-time, temporary, ad hoc or on daily wages; directly or through an agent (including a contractor), with or without the knowledge of the employer. This includes probationers, trainees, apprentices, volunteers, interns, consultants and individuals engaged in any capacity.
- **Employer:** Any person responsible for the management, supervision or control of the workplace. This includes persons discharging contractual obligations with respect to the employees and those with the authority to appoint, terminate or take disciplinary action or who represent the company in administrative or supervisory capacity.
- **Complainant:** An aggrieved person or someone authorized on their behalf (in cases of incapacity or otherwise), who submits a written or verbal complaint of sexual harassment to the Internal Complaints Committee (ICC) in accordance with the POSH Act and this policy.
- **Respondent:** The person against whom the complaint of sexual harassment has been filed. This can be any employee, supervisor, vendor, client, contractor or visitor within the context of the defined workplace.
- **Workplace:** Includes all offices, branches and offsite locations of the company, as well as any location visited by the employee arising out of or during the course of employment. It also includes transportation provided by the company, virtual or digital communication platforms used for work (e.g., Zoom, Teams, email, WhatsApp) and any location where official duties are performed including work-from-home settings.

ROLE AND RESPONSIBILITIES:

1. Employees

- Treat colleagues with dignity and respect.
- Avoid any act of sexual harassment, whether verbal, physical or digital.
- Promptly report any incident of sexual harassment they experience or witness.
- Cooperate with ICC inquiries and maintain confidentiality.

2. Managers/Supervisors

- Maintain a harassment-free work environment.
- Escalate complaints promptly to the ICC.
- Support complainants in accessing the complaints mechanism.
- Ensure no retaliation against complainants, witnesses, or ICC members.

3. Human Resources

- Support ICC with documentation, training, and awareness programs.
- Display the POSH policy and ICC details prominently.
- Provide assistance in filing police complaints if required.
- Ensure sensitization and compliance measures are implemented.

4. Internal Complaints Committee (ICC)

- Receive and investigate complaints fairly and confidentially.
- Follow principles of natural justice and adhere to timelines.
- Provide interim relief when requested.
- Submit annual reports to the District Officer.
- Recommend suitable action to the employer.

5. Company

- Ensure ICC is functional, gender-balanced, and trained.
- Provide resources for ICC functioning.
- Organize annual POSH awareness sessions.
- Protect complainants, witnesses, and ICC members from retaliation.



SEXUAL HARASSMENT INCLUDES (BUT IS NOT LIMITED TO):

- **Unwelcome Physical Contact and Advances**
 - Any inappropriate touching, brushing against someone's body, patting, hugging or deliberate invasion of personal space.
 - Repeated or unwelcome attempts to establish physical intimacy.
- **Demand or Request for Sexual Favours**
 - Any direct or implied demand for sexual acts in return for workplace benefits such as promotions, positive performance reviews, job security or other professional advantages.
 - Coercion into engaging in sexual activity through threats, blackmail or misuse of authority.
- **Sexually Coloured Remarks**
 - Comments, jokes or innuendos about a person's appearance, clothing, body, sexual orientation or behaviour that have sexual undertones.
 - Derogatory or offensive gender-based statements that perpetuate stereotypes or demean individuals.
- **Showing Pornography**
 - Displaying, sharing or sending pornographic images, videos, websites or messages through any medium, including email, chat, mobile phones or physical material in the workplace.
 - Viewing or exposing others to sexually explicit content without consent.
- **Any Verbal, Non-verbal or Physical Conduct of a Sexual Nature**
 - **Verbal:** Lewd comments, sexually suggestive jokes, catcalling, inappropriate compliments or repeated unsolicited remarks about someone's private life.
 - **Non-verbal:** Leering, staring, gestures such as winking, lip-licking, hand signs or sending emoji or messages with sexual connotations.
 - **Physical:** Blocking someone's path, unwanted touching, massaging or attempts at intimacy.

Situations that may amount to harassment:

- **Implied or Explicit Promise of Preferential Treatment**
Example: "If you agree to go out with me, I'll put in a good word for your promotion."
- **Implied or Explicit Threat of Detrimental Treatment**
Example: "If you don't cooperate, your contract might not be renewed."
- **Implied or Explicit Threat About Present or Future Employment Status**
Example: Threatening to give a poor performance review or fire an employee for rejecting advances.
- **Creating a Hostile or Intimidating Work Environment**
 - Repeated inappropriate behaviour that causes discomfort, fear or emotional distress.
 - Gossiping, mocking or targeting someone based on gender or appearance.
- **Humiliating Treatment Likely to Affect Mental Health or Safety**
Public shaming, name-calling, derogatory comments or actions that lead to anxiety, depression or harm to mental well-being.

COMPLAINT PROCEDURE

STEP 1: REPORTING A COMPLAINT

- A complaint of sexual harassment should be filed within **3 months** from the date of the incident.
 - In case of a series of incidents, it should be filed within **3 months of the last occurrence**.
 - The ICC may extend this period by **up to 3 additional months**, if there is valid justification (e.g., trauma, illness, fear, etc.).
- Complaints may be submitted in any of the following ways:
 - **Verbal:** In person or by phone, followed by written confirmation.
 - **Written:** Submitted in hard copy, addressed to the ICC.
 - **Email:** Sent to **posh@kcsecurities.com** (confidential and secure).
- If the aggrieved person is unable to file the complaint (due to physical/mental incapacity or other reasons), a **relative, friend co-worker or legal guardian** may file it on their behalf with written consent.
- The complaint must include:
 - A brief **description of the incident(s)** with date, time and location
 - **Name and details of the respondent**
 - **Names of witnesses**, if any
 - Any **supporting evidence** (emails, messages, screenshots, etc.)
 - The complaint should be signed and submitted in **six (6) copies**
- Upon receipt, the ICC will acknowledge the complaint and initiate the appropriate redressal process while ensuring **confidentiality and non-retaliation**.

Since 1954

INTERNAL COMPLAINTS COMMITTEE (ICC)

Sr. No.	Name	Designation	Contact Number	Email ID
1	Mrs. Rupal Angane	Presiding Officer	+91 9987704170	rupal.angane@kcsecurities.com
2	Ms. Sunita Vishwakarma	Internal Member	+91 8369378570	sunita.vishwakarma@kcsecurities.com
3	Mr. Chetan Shah	Internal Member	+91 9819500696	chetan.shah@kcsecurities.com
4	Mr. Vishnu Tibrewala	Internal Member	+91 9830059149	vishnu.tibrewala@kcsecurities.com
5	Mr. Vineet Agrawal	Internal Member	+91 8652630093	vineet.agrawal@kcsecurities.com
6	Ms. Palak Shah	External Member	+91 7045779737	palakshah.18ma@gmail.com

Protection of ICC Members

- All ICC members shall be protected against any form of retaliation, threat or pressure while carrying out their responsibilities. Any attempts to unduly influence ICC members or interfere with proceedings will be considered misconduct and may attract disciplinary action.
- ICC members will be selected for each case to avoid conflict of interest (not from the same function as the complainant/respondent).
- An HR representative may assist the ICC in documentation and coordination.

Tenure, Removal and Replacement of ICC Members

- The ICC members shall hold office for a term of **three (3) years** from the date of nomination.
- An ICC member may be removed and replaced before the expiry of their term if:
 - They breach confidentiality of proceedings.
 - They are found guilty of misconduct or disciplinary action.
 - They are convicted of a criminal offense or have charges pending.
 - They misuse their position or show bias during an inquiry.
- A new member shall be nominated promptly to maintain proper functioning of the ICC.

Bystander Responsibility

- A bystander refers to any individual who is not directly involved in an incident of sexual harassment but witnesses or becomes aware of such inappropriate conduct in the workplace or during work-related interactions.
- Employees who witness any act that may amount to sexual harassment—whether in person, via digital communication or during company-related events—are encouraged to report the incident to the Internal Complaints Committee (ICC) or HR, even if they are not the aggrieved party.
- All bystander reports will be handled with sensitivity and strict confidentiality. The identity of the bystander will be protected wherever possible.
- Promoting bystander reporting reinforces a culture of collective accountability and ensures a safe and respectful work environment for everyone.

Withdrawal of Complaint:

In certain situations, an aggrieved person (complainant) may wish to withdraw their complaint of sexual harassment. While the policy respects the right of the complainant to do so, the following provisions shall apply:

1. Written Request:

- The complainant must submit a written request for withdrawal to the Internal Complaints Committee (ICC), clearly stating the reasons for such withdrawal.
- The ICC shall acknowledge receipt of the request in writing.

2. ICC Discretion:

- The ICC may accept the withdrawal and formally close the case if it is satisfied that the request is genuine and voluntary.
- However, if the ICC believes that the circumstances suggest undue pressure, coercion, or if the complaint raises serious issues that need to be addressed for the safety of the workplace, it may, at its discretion, continue the inquiry despite the withdrawal request.

3. Recording and Documentation:

- The ICC shall record the withdrawal request, along with its decision (to close or proceed), in the official case file.
- The complainant shall be informed in writing of the ICC's decision and the reasons for continuing or closing the inquiry.

4. Confidentiality and Non- Retaliation:

- Regardless of withdrawal, the complainant shall remain protected against any form of retaliation, victimization, or adverse action.
- All information related to the withdrawal shall be treated with strict confidentiality.

5. Employer's Role

- The employer shall act on the ICC's recommendations following the withdrawal process, whether it involves closing the matter or proceeding with the inquiry.

STEP 2: CONCILIATION (IF REQUIRED)

- If the complainant formally requests, the ICC may initiate a conciliation process before starting a formal inquiry.
- The objective is to reach a mutual understanding between the parties in a fair and respectful manner.
- Monetary settlements are strictly prohibited as a basis for conciliation.
- If a written settlement is reached, it is recorded by the ICC and no further inquiry is conducted.
- Copies of the settlement are shared with both parties and the employer for implementation.

STEP 3: FORMAL INQUIRY:

- The complaint is shared with the respondent within 2 working days of receipt.
- The respondent must submit a written reply within 10 working days, along with any supporting documents and a list of witnesses.
- The ICC will schedule the inquiry within 5 working days of receiving the response.
- Both parties are informed in advance about:
 - Date, time and venue of the hearing
 - Names of the ICC members involved
- If the respondent fails to attend 3 consecutive hearings without sufficient cause, a 15-day final notice will be issued. If unresponsive, the ICC may proceed ex-parte.
- The inquiry must be completed within 60 days of receipt of the complaint.

- The final report and findings are shared with both parties and the employer within 7 days of conclusion.
- Legal representation is not permitted during the inquiry.
- The ICC has the powers of a Civil Court to summon individuals, examine witnesses and call for documents.

STEP 4: INTERIM RELIEF (IF REQUESTED BY COMPLAINANT)

Upon receiving a **written request** from the complainant, the Internal Complaints Committee (ICC) may recommend interim relief measures to ensure the complainant's **safety, dignity, and protection from retaliation** during the pendency of the inquiry.

Interim Relief Measures May Include:

1. **Transfer** of either the complainant or the respondent to another department, team, or location.
2. **Grant of paid leave for up to three (3) months**, in addition to the complainant's regular leave entitlements.
3. **Restriction of the respondent from supervising, reviewing, or appraising** the complainant's work during the inquiry process.
4. **Provision of professional counselling support**, if requested by the complainant, to safeguard emotional and mental well-being.
5. **Any other relief** deemed necessary by the ICC to create a safe and non-intimidating work environment.

The **employer must implement** the interim relief recommended by the ICC within **seven (7) working days** of receiving the recommendation and provide written confirmation of compliance to the ICC.

STEP 5: OUTCOME AND ACTIONS

IF ALLEGATION IS PROVEN

If the ICC concludes that sexual harassment has occurred, it shall recommend appropriate disciplinary action to the employer. Actions may include one or more of the following, depending on the severity of the misconduct:

- **Counselling or formal warning** to the respondent
- **Reassignment, suspension or termination** of employment
- **Withholding of promotion or salary increment**
- **Deduction from salary** as compensation to the complainant for emotional distress, loss of opportunity, or medical expenses
- **Reporting the case to police authorities**, especially in severe or criminal cases, as per applicable law

IF COMPLAINT IS MALICIOUS OR INTENTIONALLY FALSE:

- If the ICC concludes that the complaint was made maliciously or with the intent to defame, similar disciplinary action may be recommended against the complainant, including counselling, reprimand or termination.
- However, a complaint that is not proven due to lack of evidence, but was filed in good faith, will not attract any penalty or adverse action against the complainant.

APPEALS PROCESS

- If either the complainant or respondent is dissatisfied with the findings or recommendations of the ICC or if there is non-implementation of the ICC's recommendations by the employer, they have the right to appeal.
- The appeal must be filed **within 90 days** of receiving the ICC's report or observing non-compliance.
- Appeals should be submitted in writing to the Appeals Committee at: **posh@kcsecurities.com**.
- The Appeals Committee will review the case and respond within 90 days of receiving the appeal.

RECORD MAINTENANCE AND COMPLAINT

- The Internal Complaints Committee (ICC) shall maintain proper records of:
 - Complaints received
 - Inquiry proceedings and findings
 - Actions taken and recommendations made
- An Annual Report summarizing the number of cases, their status, and outcomes shall be filed with the District Officer as per statutory requirements.
- The company must ensure that the POSH policy and contact details of ICC members are clearly and prominently displayed at all office locations and shared with employees regularly for awareness.

COMPLAINTS RIGHTS

During the inquiry process, the complainant is entitled to request the following reliefs through the ICC:

- Transfer of either the complainant or the respondent to a different department or location
- Grant of up to 3 months' paid leave, in addition to regular leave entitlements, subject to ICC approval
- Reassignment of performance appraisal or reporting responsibilities, if the respondent is the complainant's supervisor

These rights aim to ensure the complainant's comfort, safety and protection from retaliation during the proceedings.

RETALIATION PROHIBITED

Kantilal Chhaganlal Securities Pvt. Ltd. maintains a zero-tolerance stance on retaliation.

- No employee, witness or complainant shall be subjected to any form of retaliation, victimization, intimidation or adverse treatment for:
 - Filing a genuine POSH complaint
 - Participating in or supporting the inquiry process
 - Assisting another individual in filing a complaint
- Any act of retaliation will be treated as misconduct and may attract disciplinary action as deemed appropriate by the company.

CONFIDENTIALLY

- All matters related to a POSH complaint—including the identity of the complainant, respondent, witnesses, details of the inquiry, evidence and ICC decisions—shall be treated with strict confidentiality by all involved parties.
- Disclosure of any confidential information to unauthorized individuals, whether intentional or accidental, is strictly prohibited.

Violation of confidentiality may result in a **penalty of ₹5,000** and/or disciplinary action, including termination, as per company policy and applicable laws.

OTHER GUIDELINES

Awareness, Communication and Accessibility

- The POSH policy shall be clearly displayed on all office noticeboards, shared via internal communication platforms and included in the employee onboarding kit.
- Regular sensitization workshops and training will be conducted annually for all employees, including ICC members, to reinforce awareness and compliance.
- Employees will receive periodic reminders (e.g., via email/newsletter) to familiarize themselves with the policy, reporting mechanism and ICC details.
- The company will maintain easy access to POSH resources, including the complaint form and policy, on the internal portal.

Annual Policy Review:

- This policy shall be reviewed **annually** by HR and Compliance, or earlier if required by changes in law, regulatory guidelines, or organizational needs, to ensure its continued effectiveness.

Vendor and Contractor Awareness

- Vendors, contractors, consultants, and third-party associates engaged with Kantilal Chhaganlal Securities Pvt. Ltd. are also required to **comply with the provisions of this policy**.
- They may be required to attend **awareness and sensitization sessions** to reinforce a culture of respect and zero tolerance towards sexual harassment.

There will be NO EXCEPTIONS to this policy.

Annexure A: POSH Complaint Submission Form

To be filled by the Complainant or their Representative.

1. Complainant Details

Field	Information
Full Name	
Employee ID & Designation	
Department & Location	
Contact Number	
Email ID	
Relationship to Respondent (if any)	

2. Respondent Details

Field	Information
Full Name	
Designation & Department	
Contact Information (if known)	
Location	

3. Incident Details

Field	Information
Date(s) and Time(s) of Incident(s)	
Location(s) of Incident(s)	
Brief Description of the Incident(s)	

4. Witness (If any)

Name	Department	Contact Information

5. Supporting Evidence (If any)

- ☐ Screenshots
- ☐ Emails / Messages
- ☐ Audio / Video Clips
- ☐ Other Documents: _____

6. Relief Requested (If any)

- ☐ Transfer of respondent/self
- ☐ Leave of absence
- ☐ Change of reporting manager
- ☐ Other: _____

Declaration:

I hereby declare that the information provided is true to the best of my knowledge.

Signature of Complainant: _____

Date: _____

Place: _____

Annexure B: ICC Member Declaration Form

This declaration is to be signed by every ICC member annually or before participating in an inquiry.

I, _____, hereby affirm that:

1. I do not have any conflict of interest in handling POSH complaints.
2. I will maintain absolute confidentiality regarding all matters handled.
3. I understand my responsibilities as an ICC member.

Signature: _____

Date: _____

Place: _____

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Annexure C: Conciliation Settlement Agreement

This is to confirm that the complaint dated _____ filed by _____ against _____ has been amicably settled through mutual discussion and conciliation.

Terms of Settlement:

1. _____
2. _____

Signature of Complainant: _____

Signature of Respondent: _____

ICC Representative: _____

Date: _____

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Annexure D: Inquiry Report Format

Case Title: _____

Complainant: _____

Respondent: _____

Summary of Complaint:

Summary of Evidence and Witnesses:

Findings of the ICC:

Final Recommendation:

Date of Completion: _____

ICC Members (Signatures):

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Annexure E: Annual Report Format (For District Officer)

Report Parameter	Details
Number of complaints received during the year	
Number of complaints disposed of during the year	
Number of cases pending more than 90 days	
Number of workshops or awareness programs conducted	
Nature of action taken by the employer	



Annexure F: Request for Interim Relief

(To be submitted by the Complainant to the Internal Complaints Committee)

Date: _____

Place: _____

To

The Presiding Officer

Internal Complaints Committee (ICC)

Kantilal Chhaganlal Securities Pvt. Ltd.

Subject: Request for Interim Relief under POSH Policy

Dear Presiding Officer,

I, _____ (Full Name), working as _____
(Designation/Department), have filed a complaint of sexual harassment dated _____.

In view of the ongoing inquiry, I request the ICC to kindly consider granting the following interim relief(s) to ensure my safety, dignity, and protection from retaliation:

Requested Relief(s):

- ☐ Transfer of respondent/self to another department or location
- ☐ Paid leave for up to 3 months (in addition to existing leave)
- ☐ Restriction of respondent from supervising/reviewing/appraising my work
- ☐ Professional counselling support
- ☐ Other (please specify): _____

Reason(s) for Request:

I hereby declare that the above information is true to the best of my knowledge.

Signature of Complainant: _____

Name: _____

Employee ID (if applicable): _____

Contact No.: _____

Annexure G: POSH Awareness Activities Record

Date	Type of Activity	Conducted By	Number of Participants	Remarks



Annexure: Relevant Legal Provisions

In addition to disciplinary action under this policy, certain acts of sexual harassment may amount to **criminal offenses** under the **Indian Penal Code (IPC)**. Employees are reminded that such conduct may result in both internal disciplinary measures and criminal prosecution.

Relevant IPC Sections include:

- **Section 354** – Assault or criminal force on a woman with intent to outrage her modesty.
- **Section 354A** – Sexual harassment and punishment for sexual harassment.
- **Section 354C** – Voyeurism (watching, capturing, or disseminating images of a woman engaged in a private act without her consent).
- **Section 354D** – Stalking, including monitoring a woman's use of the internet, email, or other forms of electronic communication without consent.
- **Section 375 & 376** – Rape and punishment for rape.
- **Section 509** – Word, gesture, or act intended to insult the modesty of a woman.

Company Assistance:

Kantilal Chhaganlal Securities Pvt. Ltd. will assist the complainant in filing a police complaint/FIR if they choose to pursue criminal proceedings under these provisions. The company will extend necessary support to ensure the complainant feels safe and empowered to take further legal action, if desired.

