

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

SelfFin India Financial Services Private Limited

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1. Introduction

SelfFin India Financial Services Private Limited (“SelfFin” or “the Company”) is committed to conducting its business responsibly and to maintaining a workplace in which every person is treated with dignity, fairness and respect. The Company recognises that a safe and inclusive work environment is essential for employees and other individuals who interact with SelfFin.

SelfFin adopts a zero-tolerance approach to sexual harassment and is committed to complying with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”), the rules made thereunder and other applicable requirements.

The Company’s approach is intended to:

- prevent and prohibit sexual harassment in all forms, including physical, verbal, non-verbal, written, visual and electronic conduct;
- promote a professional culture based on dignity, equality, respect and accountability;
- provide a workplace that is safe and supportive for employees, interns, consultants, contractual personnel, trainees, vendors and visitors;
- maintain an accessible, fair, confidential and transparent mechanism for receiving and addressing complaints;
- ensure that complaints made in good faith are dealt with promptly and that complainants and participants in the process are protected from retaliation;
- extend appropriate protection and awareness measures to office-based, remote, hybrid, virtual and business-travel environments; and
- support regular awareness and sensitisation initiatives concerning respectful workplace behaviour and prevention of harassment.

Every employee and associated person is expected to uphold the intent of this Policy and contribute to a workplace in which people can work without fear, intimidation, discrimination or harassment.

2. Objective

The objective of this Policy is to establish clear standards for preventing, prohibiting and addressing sexual harassment at the workplace. It also provides a structured process through which concerns can be raised and examined in accordance with the POSH Act.

SelfFin expects all persons covered by this Policy to maintain professional conduct and to respect personal dignity and boundaries. The Company will take appropriate steps to address conduct that is found to constitute sexual harassment or other prohibited behaviour.

3. Scope of the Policy

This Policy applies to all persons working with, engaged by, or otherwise associated with SelfFin, including the following categories:

- permanent employees;
- probationers, trainees and apprentices;
- interns, whether paid or unpaid;
- contractual employees and temporary personnel;
- consultants, retainers and professional service providers;

- gig workers, where applicable;
- employees of vendors and service providers;
- customers, clients and other persons visiting or interacting with the Company; and
- any other person covered by the POSH Act or applicable law.

The Policy also applies to conduct occurring in connection with work outside the office, including work-from-home arrangements, virtual workplaces, online meetings, official messaging and email, digital communication platforms, business travel, work events and other work-related interactions.

4. Definition of Sexual Harassment

For the purposes of this Policy, sexual harassment includes any unwelcome act, behaviour, communication or conduct of a sexual nature that may create an intimidating, hostile, offensive, humiliating or otherwise unsafe work environment.

Examples may include, without limitation:

- unwelcome physical contact or advances;
- a demand or request for sexual favours;
- sexually suggestive, explicit or coloured remarks;
- displaying or circulating pornographic or sexually explicit material;
- unwelcome verbal, written, visual or physical conduct of a sexual nature;
- inappropriate jokes, gestures, messages, emails, images or digital content of a sexual nature; and
- other unwelcome conduct that violates an individual's dignity, privacy or personal boundaries.

Sexual harassment may occur at the workplace or in any location or situation connected with employment, including official events, meetings, business travel, virtual meetings and digital communication platforms. Nothing in this Policy limits the scope of the definition or circumstances recognised under the POSH Act. Where the law provides a broader or different requirement, the applicable legal requirement shall prevail.

5. Workplace Responsibilities

All employees and persons covered by this Policy are expected to contribute to a professional, respectful and inclusive workplace. Sexual harassment and conduct that violates the standards established by this Policy are strictly prohibited.

Employees and other covered persons are expected to:

- maintain professional and respectful conduct;
- respect the dignity, privacy and personal boundaries of colleagues and other persons;
- refrain from behaviour that may amount to sexual harassment;
- cooperate honestly and appropriately with an inquiry conducted under this Policy; and
- raise concerns or report incidents in good faith through the channels available under this Policy.

6. Internal Complaints Committee (ICC)

SelfFin has constituted an Internal Complaints Committee ("ICC") in accordance with the requirements of the POSH Act. The ICC is responsible for receiving and dealing with complaints of sexual harassment in a fair, impartial and confidential manner and for performing the duties assigned to it under applicable law.

The Company encourages employees, interns, trainees, consultants, contract workers and other persons covered by this Policy to report concerns promptly. A complaint may be made directly to an ICC member, through the designated POSH email channel, or through the Government of India's She-Box mechanism.

Position in the Committee	Name of the Employee	Designation	Phone No.	Email ID
Member	Amrit Kaur	Director	8850014808	amrit.kaur@selfinindia.com
Member	Alishaa A	Grievance Officer / Nodal Officer		alishaa@selfinindia.com
Non-Govt. Member	Sangeeta Palekar	Independent Member	9967535989	sangeetapalekar23@gmail.com

The ICC shall discharge its responsibilities in accordance with the POSH Act, including receiving complaints, conducting inquiries, maintaining confidentiality, making recommendations and supporting appropriate preventive and awareness measures.

7. Complaint Redressal Mechanism

SelfFin is committed to providing an accessible and effective mechanism for addressing complaints relating to sexual harassment. Any person who experiences or witnesses conduct covered by this Policy is encouraged to raise the concern without fear of retaliation.

A complaint may be submitted in writing to the ICC in accordance with the requirements and timelines prescribed under the POSH Act. Where appropriate, the complainant may also approach the Human Resources function, the reporting manager or an ICC member for assistance in understanding the process. The available channels include:

- any member of the Internal Complaints Committee listed above;
- the designated POSH/ICC email channel: alishaa@selfinindia.com;
- the Human Resources function or reporting manager, who shall facilitate appropriate escalation to the ICC; and
- the Government of India's She-Box Portal, where applicable.

Complaints and related information shall be handled with sensitivity, fairness and confidentiality. SelfFin will not tolerate retaliation, victimisation, intimidation or adverse treatment of a person who raises a genuine concern or participates in an inquiry in good faith.

8. Inquiry Process

On receipt of a complaint, the ICC shall undertake the inquiry in accordance with the POSH Act and the principles of natural justice. The complainant and respondent shall be given a fair opportunity to present their respective statements, evidence and witnesses, subject to the statutory process.

The identity of the complainant, respondent, witnesses, proceedings and related information shall be kept confidential to the extent required by law. The ICC may examine documents, electronic communications and other relevant evidence and may interact with persons necessary to establish the facts.

The inquiry shall ordinarily be completed within the period prescribed under the POSH Act. Where interim relief or other protective measures are appropriate, the ICC may recommend such measures in accordance

with law, including changes in reporting arrangements, work location or other reasonable steps intended to protect the parties and preserve a safe working environment.

Following completion of the inquiry, the ICC shall record its findings and make recommendations in accordance with the POSH Act. The Company shall act on such recommendations within the applicable statutory framework.

9. Disciplinary Action

SelfFin adopts a zero-tolerance approach to sexual harassment. Where an inquiry establishes misconduct, the Company shall take appropriate action having regard to the nature, seriousness and circumstances of the conduct and the requirements of applicable law.

Depending on the circumstances, corrective or disciplinary measures may include:

- counselling, written warning or reprimand;
- mandatory sensitisation or corrective training;
- withholding or deferment of promotion or other employment benefits, where permitted;
- suspension or other disciplinary measures;
- termination of employment or contract, where warranted; and
- other action permitted or required under the POSH Act, Company policy or applicable law.

Where the conduct may constitute a criminal offence or otherwise requires external reporting, SelfFin may take appropriate steps in accordance with applicable law. Disciplinary action shall be proportionate, fair and consistent with the findings of the ICC and the applicable statutory framework.

10. False Complaints

SelfFin encourages the reporting of genuine concerns and recognises that a complainant may not always be able to establish every aspect of an allegation. A complaint shall not be treated as false merely because the allegation is not substantiated after inquiry.

Where the ICC, after due inquiry, determines that a complaint was knowingly false, malicious, fabricated or made with deliberate intent to mislead, appropriate action may be taken in accordance with the POSH Act and the Company's disciplinary framework.

No employee shall be penalised merely because a complaint could not be proved, provided the complaint was made in good faith and without malicious intent.

11. Confidentiality

Complaints of sexual harassment involve sensitive personal information. SelfFin shall maintain confidentiality throughout the complaint and inquiry process to the extent required by the POSH Act and other applicable law.

- information concerning the complaint, statements, evidence, inquiry proceedings and recommendations shall be shared only with persons who have a legitimate need to know;
- the identity of the complainant, respondent and witnesses shall not be disclosed except where disclosure is required or permitted by law;

- ICC members, employees and other persons involved in the process are expected to preserve confidentiality and professional discretion; and
- unauthorised disclosure may result in appropriate action under applicable law and Company policy.

12. Protection Against Retaliation

Retaliation, victimisation, intimidation or adverse treatment against any person who raises a complaint, participates in an inquiry, provides evidence or otherwise supports the grievance process in good faith is prohibited.

Retaliatory conduct may include threats, discrimination, exclusion from legitimate work-related activities, adverse performance treatment, demotion, hostile behaviour or any other action intended to discourage or punish a person for using the complaint mechanism.

Any concern regarding retaliation should be brought promptly to the ICC or Human Resources. SelfFin shall take appropriate steps to address such concerns and protect the integrity of the complaint process.

13. Display of POSH Policy

SelfFin shall display this POSH Policy and the information required under the POSH Act at its office locations and, where appropriate, through relevant employee communication channels.

The information displayed shall include, as applicable:

- details of the Internal Complaints Committee and the contact information of its members;
- the designated channel for submitting POSH complaints;
- information concerning employee rights and responsibilities under the Policy; and
- the consequences of sexual harassment and other prohibited conduct.

The Company may also communicate POSH information through its intranet, employee handbooks, training sessions, sensitisation programmes, emails and other awareness initiatives.

14. Penal Consequences Under the POSH Act

Sexual harassment is a serious violation of workplace standards and individual dignity. A person found responsible for sexual harassment may be subject to disciplinary and other consequences in accordance with the POSH Act, Company policy and applicable law.

Depending on the circumstances, consequences may include:

- censure or warning;
- withholding of increment or promotion, where permitted;
- demotion or reduction in role or responsibilities, where appropriate;
- reduction or withholding of salary or other benefits, where legally permissible;
- suspension;
- discharge or termination of employment or engagement; and
- other measures prescribed or permitted under applicable law.

In cases involving conduct that may constitute a criminal offence, SelfFin may cooperate with law-enforcement or other competent authorities and take such steps as may be required by law.

15. She-Box Portal

In addition to the Company's internal complaint mechanism, eligible individuals may use the Government of India's She-Box Portal for reporting workplace sexual harassment and obtaining access to the applicable external grievance mechanism.

Use of the She-Box mechanism does not prevent a person from approaching the Company's Internal Complaints Committee where permitted under applicable law. SelfFin shall extend appropriate cooperation in connection with any lawful inquiry or process initiated through the portal or by a competent authority. Employees may access the Government of India's She-Box service through the official government portal.

16. Policy Review

This Policy shall be reviewed periodically and amended whenever necessary to reflect changes in applicable law, regulatory requirements, Company operations, workplace practices or recommendations arising from implementation.

Where any provision of this Policy is inconsistent with a mandatory requirement of the POSH Act or other applicable law, the applicable legal requirement shall prevail.