

ACAASA MANAGEMENT SERVICES PRIVATE LIMITED

Prevention of Sexual Harassment of Women at Workplace

1. INTRODUCTION / PURPOSE

At Acaasa Management Services Private Limited, we desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protect the dignity and respect of every individual. Integrity, honesty, transparency and respect for people remain some of our core values. Therefore, we have zero-tolerance for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

The Prevention of Sexual Harassment at Workplace Policy (“**Policy**”) is aimed at creating awareness amongst the employees at **Acaasa Management Services Private Limited** about what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.

The Policy is made in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“**POSH Act**”) and recognizing that sexual harassment violates the fundamental right of women to equality and equal protection.

Acaasa Management Services Private Limited will exercise utmost care in treating the entire process with the dignity, sensitivity and respect it merits including taking protective measures for the benefit of the victim / harassed person.

2. APPLICABILITY

The Policy is applicable to:

- i. Every employee working at **Acaasa Management Services Private Limited**, including but limited to, permanent or temporary employees, trainees, interns, and employees engaged on a probationary or contractual basis.
- ii. An alleged act of sexual harassment shall include any incident of sexual harassment (as defined below) that may take place during or beyond office hours, including but not limited to, telecoms after office hours, business trips, business meetings and business related social events.
- iii. An alleged act of sexual harassment shall include any incident of sexual harassment (as defined

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below) that may take place within the office premises or outside the office premises, including but not limited to, transportation provided by the employer from the office to client's place, client's place to office/home, business trips, business meetings and business related social events.

- iv. This Policy is only applicable when both or either the alleged harasser and the victim are employees/agents of the Company. The Policy shall not be applicable in cases where both the alleged harasser and the victim are third parties.

3. DEFINITIONS

- i. **Sexual Harassment:** An act of sexual harassment is any unwelcome sexually determined behavior, including but not limited to, physical contact and advances; a demand or request for sexual favors, whether verbal, textual, graphic, and electronic, making sexually colored remarks, showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

An act of sexual harassment also includes verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures. It also includes a demand or request for sexual favors in return for a promise of work related favors, such as, performance appraisals, promotions, transfers, salary increments, benefits in employment or any other form of reward or recognition.

Sexual harassment need NOT involve physical contact. Any act that creates a hostile work environment - be it by virtue of cracking lewd jokes, verbal sexual abuse, circulating lewd rumors etc., shall fall within the meaning of sexual harassment.

Further, any act which might not be questionable in itself, if done with a sexual intent involved, shall constitute sexual harassment. For instance, a complimenting or appreciating someone's attire will not fall under an act of sexual harassment. However, if the same act is done with a sexual intent, the act will become an act of sexual harassment.

- ii. **"Complainant":** A person reporting an incident of Sexual Harassment.
- iii. **"Victim":** A person who has been subjected to Sexual Harassment.
- iv. **"Alleged Harasser":** Any person who is alleged/reported to have committed an act of Sexual Harassment.
- v. **"Internal Complaints Committee"** – The Internal Complaints Committee formed for enquiring into the complaints of sexual harassment.

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- vi. **“Presiding Officer”** – A senior female representative appointed from the Company to head the Internal Complaints Committee.

4. INTERNAL COMPLAINTS COMMITTEE

4.1 Constitution and Role:

- a. In accordance with Supreme Court Guidelines and the POSH Act, to manage the process of inquiry and redressal of sexual harassment complaints, Acaasa Management Services Private Limited has formed an Internal Complaints Committee.
- b. The Company shall have an Internal Complaints Committee comprising of four (4) internal members and one (1) external member.
- c. Not less than half of the members of the Internal Complaints Committee shall be women.
- d. Names of the members of the Internal Complaints Committee along with their contact details are provided in Annexure A.
- e. The HR representative shall periodically update the list of names and contact details of the members.
- f. The Presiding Officer and every member of the Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination.
- g. The changes in the constitution of the Internal Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

4.2 Functions and Powers of the Internal Complaints Committee:

- a. The Internal Complaints Committee established in the Company’s office for inquiring into complaints of sexual harassment shall be deemed to be the Inquiring Authority appointed by the management of the Company. The Internal Complaints Committee shall hold the inquiry in accordance with the procedure laid down under Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

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- b. The Internal Complaints Committee shall have power and jurisdiction to conduct an inquiry in respect of any complaint of sexual harassment at workplace.
- c. The Internal Complaints Committee shall also have the power to:
 - I. recommend transfer and/or; suspension of any alleged harasser
 - II. recommend penalties as per service rules of the Company;
 - III. submit its report to the management of the Company for taking necessary action against any person who is found guilty of an act of sexual harassment at workplace.
- d. The Internal Complaints Committee shall organize programs for the gender sensitization of employees through awareness programs.
- e. Submission of annual report - The Internal Complaints Committee shall in each calendar year prepare, in such form and at such time as may be prescribed, an annual report and submit the same to the employer and the District Officer.
- f. The Internal Complaints Committee shall meet once a quarter and review preparedness to deal with any complaints of sexual harassment at the workplace, even in the event of there being no reported cases of sexual harassment.
- g. The quorum for the purpose of meeting/hearing shall be at least 2/3rd of the members of the Internal Complaints Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting.
- h. The minutes of every meeting shall be recorded in the Minutes of the meeting maintained for the purpose and shared with the committee members over a mail.

5. PROCESS OF REPORTING INCIDENT OF SEXUAL HARASSMENT

Whom to contact in case of an incident of sexual harassment?

- a. Any person facing sexual harassment at workplace (i.e., the victim) shall make a complaint in writing or through email to the Internal Complaints Committee.
- b. Any person facing sexual harassment at workplace (i.e., the victim) may also contact his/ her supervisors, division heads or / and HR Department. If the victim is unable to contact or report the

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incident to any of the aforementioned, the victim may contact any other employee in the Company in this regard.

Process of making a complaint:

- a. Any aggrieved person shall make a complaint of sexual harassment at workplace to the Internal Complaints Committee, in writing or through email, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of the last incident
- b. The complaint should include the contact details of the complainant / victim such as name, address, contact number, department etc. In all the cases above, the written complaint/email must provide the details of the incident together with the name/s of the alleged harasser/s and the victim/s, as available.
- c. Provided that where such complaint cannot be made in writing, the Presiding Officer or any other member of the Internal Complaints Committee, shall render all reasonable assistance to the complainant for making the complaint in writing.
- d. Provided further that the Internal Complaints Committee, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the complainant from filing a complaint within the said period.
- e. Depending upon the nature of the complaint, the Internal Complaints Committee may direct the parties to conciliation or direct for inquiry to be conducted in respect of the complaint filed.

In case of a Conciliation:

- a. The Internal Complaints Committee before initiating an inquiry and at the request of the aggrieved person shall take steps to settle the matter through conciliation. The conciliation shall not involve any monetary settlement.
- b. The Internal Complaints Committee shall provide an opportunity of hearing to the victim as well as the alleged harasser, to represent their position and provide any explanations.
- c. Where a settlement is arrived at through conciliation, the same shall be recorded in writing.
- d. The Internal Complaints Committee will provide the copies of the settlement arrived at after the conciliation process to the victim as well the alleged harasser.

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In case of an inquiry into complaint

- a. In the event, an inquiry is found to be necessary, the Internal Complaints Committee shall make the inquiry.
- b. For the purpose of making an inquiry, the Internal Complaints Committee shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:—
 - i. summoning and enforcing the attendance of any person and examining him under oath
 - ii. requiring the discovery and production of documents; and
 - iii. any other matter which may be prescribed.
- c. The Internal Complaints Committee shall discuss the procedure for making an inquiry and communicate the same to the victim and the alleged harasser within a period of 7 working days.
- d. If the complainant desires to submit any documents by way of evidence before the Internal Complaints Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to submit any documents in evidence before the Internal Complaints Committee he / she shall supply original copies of such documents. Any person submitting any documents in support of their affix his / her signature on the respective documents to certify these to be original copies.
- e. The Internal Complaints Committee shall maintain written record of all discussions in respect of the inquiry made.
- f. The inquiry shall be completed within a maximum period of 30 working days (4 weeks).
- g. The Internal Complaints Committee shall submit their findings in respect of the inquiry and present the decision, along with the recommended action thereon to the HR Department within a maximum period of 14 working days (2 weeks) after the inquiry is completed.
- h. The HR Department may seek clarifications from the Internal Complaints Committee on the recommendations made. The HR Department shall thereafter implement the recommendations, after informing the Management, within a maximum period of 7 working days (1 week).

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- i. On the completion of an inquiry, the Internal Complaints Committee shall provide a report on its findings to both the victim and the alleged harasser.
- j. Where the Internal Complaints Committee as the case may be, arrives at the conclusion that the allegation against the alleged harasser has not been proved, it shall recommend to the HR department that no action is required to be taken in the matter.
- k. Where the Internal Complaints Committee, arrives at a conclusion that during the inquiry a witness has given false evidence or has produced any forged or misleading document, it may recommend to the HR Department, to take strict disciplinary action. These disciplinary actions may include – issuance of show cause notice, suspension, monetary fine, stoppage of increment, reducing the rank, termination etc.
- l. The final decision shall be communicated to the victim and the alleged harasser in both the instances above.
- m. The end-to-end process of an inquiry, including investigation, decision making and reporting shall be completed within a maximum period of 60 working days of receiving the complaint.

6. FUNCTIONS OF INTERNAL COMPLAINTS COMMITTEE

- a. To conduct an inquiry into any complaints made in respect of of sexual harassment at workplace.
- b. To notify in writing/email the time and dates of the meetings to be held, to the complainant, victim and the alleged harasser.
- c. Provide copy of the complaint to the alleged harasser within reasonable time, prior to commencement of inquiry.
- d. Conduct the inquiry at a neutral location, providing an environment conducive for both the victim and alleged harasser.
- e. Appropriate minutes of the meeting, including the submissions made by the parties and the observations Committee members shall be recorded. During the process of investigation, the Internal Complaints Committee shall ensure that no further harassment or victimization happens to either the victim or the alleged harasser. The internal Complaints Committee shall also ensure that there is no proximity at workplace.
- f. Between the victim and the alleged harasser, during the pendency of the Complaint.

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- g. The final decision of the Internal Complaints Committee, along with the findings, observations and recommended actions shall be communicated to the CEO of the Company.
- h. The final decision of the Internal Complaints Committee shall be communicated to the victim and the alleged harasser.

7. APPEAL

If any party desires to appeal the decision, he/she may appeal in writing to the Vice President of the Company, who shall decide the appeal within one month from the date of such appeal.

8. DISCIPLINARY ACTION:

Possible disciplinary actions if the harasser is found guilty or it is found that the complainant has filed a fake complaint with malicious intentions:

- I. Issuance of a letter of warning that will be placed in the personal file of the harasser/complainant.
- II. Immediate suspension without pay or both.
- III. Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- IV. Stoppage of increment with or without cumulative effect.
- V. Reduction in rank.
- VI. Termination/dismissal from the services of the Company.
- VII. Filing a Complaint before the relevant police station/Court.
- VIII. Any other action that the Internal Complaints Committee may deem fit.

9. ROLES AND RESPONSIBILITIES:

9.1 Employees: Are encouraged to familiarize themselves with the key elements of the Policy and should:

- a. Abstain from committing any acts which amount to sexual harassment at the workplace.
- b. Report incidents of sexual harassment without fear or seeking favour.

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- c. Create an environment of conclusiveness for co-workers to work together without fear of harassment.
- d. Get clarifications from HR / Committee whenever in doubt.

9.2 HR Department:

- a. Conduct necessary communication and training across the Company, with respect to sexual harassment at the workplace.
- b. Ensure this Policy is communicated, explained and handed over at the time of induction of every employee.
- c. Any act of sexual harassment to be notified as misconduct under the Standing Orders of the Company.
- d. Provide clarifications on any queries related to this Policy, wherever required.
- e. Maintain records of all the complaints made in respect of sexual harassment cases and findings thereof.
- f. Ensure that this Policy is communicated through appropriate channels.
- g. Recommend actions to be taken along with Internal Complaints Committee.
- h. Ensure implementation of this Policy in line with overall Code of Conduct Guidelines of the Company.
- i. Ensure appropriate training is provided to members of the Internal Complaints Committee, including training on gender sensitivity.
- j. Ensure Internal Complaints Committee meetings are taking place periodically and the relevant minutes are recorded.

9.3 Employer: Employer shall—

- a. Provide a safe working environment at the workplace which shall include safety of every the persons coming at the workplace;
- b. Display at any conspicuous place in the workplace, the penal consequences of sexual harassment; and the order constituting the Internal Complaints Committee;
- c. Organize workshops and awareness programs at regular intervals for gender sensitization, in line with the provisions of the Act and orientation programs for the members of the Internal Complaints Committee in the manner as may be prescribed;
- d. Assist in securing the attendance of respondent and witnesses before the Internal Complaints Committee.
- e. Provide assistance to the complainant if she/he so chooses to file a complaint in relation to the offence under the Indian Penal Code, 1908 or any other law for the time being in force;
- f. Cause to initiate action, under the Indian Penal Code, 1908 or any other law for the time being in force, against the perpetrator, or if the aggrieved complainant so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;

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g. Monitor the timely submission of reports by the Internal Complaints Committee.

10. POWER TO MAKE RULES AND AMENDMENT

The power to make any rules pertaining to prevention of sexual harassment at workplace vests with the Management Committee of Acaasa Management Services Pvt. Ltd. Any changes to these rules shall be suitably communicated to all the employees.

Yours Sincerely,

For Acaasa Management Services Pvt. Ltd.

DHARM
ENDRA
KALRA
Digitally signed
by
DHARMENDRA
KALRA
Date: 2026.03.16
12:36:56 +05'30'

Dharmendra Kalra

Chief Executive Officer



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Acaasa Management Services Private Limited

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ANNEXURE - A

PRESIDING OFFICER: Ms. Meghna Khosla

INTERNAL COMPLAINTS COMMITTEE EXTERNAL MEMBER: Adv. Ruhani Kwatara

COMITTEE MEMBERS: Mr. Aadarsh

Ms. Tripti Pandey



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