
ANTI-SEXUAL HARASSMENT POLICY



Standard Capital
Markets Limited

STANDARD CAPITAL MARKETS LIMITED

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Anti-Sexual Harassment Policy

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1. Policy Statement

- 1.1. At SCML, we are committed to providing a work environment free from Sexual Harassment, where every employee is treated with dignity, respect, and equality. We take all allegations seriously and will address them according to the procedures set out in this policy.
- 1.2. In compliance with Indian law, organizations with ten or more employees must form an Internal Committee (IC) to handle Sexual Harassment complaints. SCML has established this committee and implemented specific procedures to manage such cases.
- 1.3. Sexual Harassment violates the fundamental right to live with dignity under Article 21 of the Indian Constitution and international human rights standards, including the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW).
- 1.4. This policy is in line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (POSH Act) and applies to all employees and

stakeholders of SCML, whether permanent, temporary, or visiting customer sites. It will be shared across all the branches of SCML to ensure a consistent approach to preventing and addressing Sexual Harassment.

2. Scope and Eligibility

- 2.1. This Policy applies to all employees, as well as all individuals and parties associated with SCML, including those engaged in work-related activities or connected to SCML in any capacity. It is deemed to be an integral part of the service conditions of all employees.
- 2.2. SCML maintains a zero-tolerance stance towards Sexual Harassment of its employees, even if it occurs due to actions by a third-party or external individual during work duties.
- 2.3. As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Rules, 2013, if the Aggrieved woman is unable to file a complaint due to physical incapacity, the complaint may be lodged by her relative, friend, or co-worker on her behalf.
- 2.4. In the context of SCML, the workplace encompasses:
 - 2.4.1. All offices or locations where SCML conducts its operations.
 - 2.4.2. All work-related activities undertaken in the field away from SCML's facilities.
- 2.5. SCML will take immediate and swift action via a redressal system that is established for addressing cases of Sexual Harassment involving an SCML employee, whether it occurs inside or outside the workplace. If Sexual Harassment involves a third party targeting an SCML employee, prompt measures will be implemented to safeguard the complainant and to begin action against the perpetrator, which may include collaborating with the relevant employer or, if not

feasible, engaging with the appropriate criminal justice system.

3. Definitions

- 3.1. **Aggrieved woman:** In relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- 3.2. **Respondent:** Means a person against whom the aggrieved woman has made a complaint.
- 3.3. **Employee:** Means a person employed at a workplace for any work on regular, temporary, ad hoc, or daily wage basis, either directly or by or through an agent (including a contractor), with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 3.4. **Employer:** In relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf. In any workplace not covered above, any person responsible for the Management, supervision, and control of the workplace.
- 3.5. **Appropriate Government:** Means, in relation to a workplace which is established, owned, controlled, or wholly or

substantially financed by funds provided directly or indirectly—

- 3.5.1. by the Central Government or the Union territory administration, the Central Government;
- 3.5.2. by the State Government, the State Government.
- 3.5.3. In relation to any workplace not covered under above, and falling within its territory, the State Government.

3.6. Workplace:

- 3.6.1. All Premises, locations, establishments, enterprises, institutions, offices, branches or units established, or subsidiaries which are controlled by SCML.
- 3.6.2. Any site away from SCML's premises where any activity related to SCML's business is organized or arranged for, by SCML.
- 3.6.3. Any place visited by an employee arising out of or during the course of employment, including any transportation provided by SCML for undertaking such journey.

3.7. **Sexual Harassment:** consists of any physical or verbal behavior and any form of communication that has unnecessary, improper, or unwelcome sexual connotations. Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:—

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

4. Circumstances which may amount to Sexual Harassment

The following circumstances, among other circumstances, may also amount to Sexual Harassment:

- 4.1. Implied or explicit promise of preferential treatment of the victim in his/her employment; or
- 4.2. Implied or explicit threat of detrimental treatment of the victim in his/her employment; or
- 4.3. Implied or explicit threat about the victim's present or future employment status or
- 4.4. Interference with the victim's work or creating an intimidating or offensive or hostile work environment for the victim; or
- 4.5. Humiliating treatment likely to affect the victim's health or safety.

This list is illustrative and not exhaustive.

5. Internal Complaints Committee (ICC)

SCML has instituted an Internal (SHWP) Complaints Committee (ICC) as outlined in the POSH Act for redressal of Sexual Harassment complaints and ensuring time bound treatment of such complaints. The names and contact details of the members of the Internal Complaints Committee will be provided in **Annexure I**.

5.1. Composition of the Internal Complaints Committee:

The ICC shall be constituted by a resolution of the Executive Committee/Board. It shall consist of a minimum of four members:

- 5.1.1. **Presiding Officer:** The Presiding Officer shall be a Women employed at a senior level at workplace from amongst the employees; (if senior level woman employee is not available, Presiding Officer shall be

nominated from other Offices or Administrative Units of the Workplace of the same Employer or other Dept. or Organization).

5.1.2. **Employee Members:** The ICC shall include two employee members, selected from among the employees of SCML. Preference will be given to employees who are committed to women's rights, have experience in social work, or possess legal knowledge.

5.1.3. **External Member:** The ICC will include one external member who will be selected from an NGO or an association that is committed to the cause of women or has expertise in dealing with Sexual Harassment issues. This external member will bring valuable insights and an impartial perspective to the committee.

5.1.4. Half of the members so nominated shall be Women.

5.2. Term of Office

5.2.1. The members of the ICC will hold office for a term not exceeding three years from the date of their appointment.

5.2.2. In the event of the resignation or removal of the Presiding Officer or any of the members, the Human Resources Officer (HRO) shall initiate the process to fill such vacancies within 90 days from the date of separation. This ensures the continuity and effectiveness of the committee.

5.2.3. The Managing Director of SCML shall provide necessary support to the ICC to ensure the effective functioning of the committee. The management will facilitate all resources needed for the proper implementation of the POSH policy and for addressing complaints of Sexual Harassment in a fair and timely manner.

5.3. Fees or Allowance's

- 5.3.1. The external member appointed from a non-governmental organization or association shall be entitled to a fee or allowance, as determined by the SCML from time to time, for participating in the proceedings of the Internal Complaints Committee.

5.4. Removal from Office

The Presiding Officer or any member of the ICC may be removed under the following circumstances:

- 5.4.1. contravene the provisions relating to confidentiality of contents of complaint and inquiry proceedings.
- 5.4.2. has been convicted of an offence or an inquiry is pending against him under any law for the time being in force.
- 5.4.3. has been found guilty in disciplinary proceedings or if disciplinary proceedings are pending against them.
- 5.4.4. has abused his position in a manner that renders their continuation in office detrimental to public interest.

5.5. Duties and Responsibilities

The following are the duties and responsibilities of the Presiding Officer and Members of ICC:

- 5.5.1. It is the responsibility of presiding officer and members of ICC to provide all necessary help to the Aggrieved woman in filing a written complaint if she is unable to do so independently.
- 5.5.2. Attempt to settle the matter through conciliation, if requested by the Aggrieved woman, before initiating an inquiry.
- 5.5.3. To follow the inquiry process with integrity and diligence.
- 5.5.4. To ensure that all rights afforded to the Aggrieved woman under the POSH Act are respected and upheld.

- 5.5.5. To respect the privacy of the Aggrieved woman and maintain confidentiality throughout the proceedings.
- 5.5.6. File a criminal complaint if warranted by the circumstances.
- 5.5.7. Preserve records of all the complaints received by it, including its report and any other relevant information related thereto for a period of at least three years and submit statistical information on the number of cases filed and resolved for reporting and compliance purposes.
- 5.5.8. Preparing annual reports for each calendar year and submit it to the Managing Director of the Company and the District Officer on or before given time as per the Act.

6. Procedure for Lodging a Complaint

- 6.1. Any Aggrieved woman may file a written complaint of Sexual Harassment with the Internal Complaints Committee (ICC) through mail to _____, within three months of the incident, or within three months from the most recent incident in the case of multiple incidents.
- 6.2. The ICC may extend the time limit for a further period of three (3) months if it is satisfied that the circumstances were such that it prevented the complainant from filing the complaint within the specified timeline.
- 6.3. The complaint shall be signed by the complainant and contain the following details:
 - 6.3.1. The name of the complainant and contact details
 - 6.3.2. The name of the alleged harasser and contact details of the same as available with the complainant.

- 6.3.3. Details of the incident(s) of Sexual Harassment as may be necessary to enable the committee to investigate the matter.
- 6.3.4. Evidence (if any) that the complainant would like to submit in support of his/her case.
- 6.3.5. Witness (if any) who the complainant would like to produce in support of his/her case.
- 6.4. If the complainant is unable to make complaint in writing for any reason, any member of the committee who receives the complaint shall render all reasonable assistance to the complainant to reduce the complaint into writing and obtain the complainant's signature.
- 6.5. If the complainant is not literate, it shall be the duty of the person before whom the oral complaint is made to reduce the same in writing, read out the complaint to the complainant in the language requested by the complainant and obtain the signature/ thumb impression of the complainant.
- 6.6. In case the complainant is physically or mentally incapacitated, deceased, or otherwise unable to make a complaint, her legal heir or another person as designated by the applicable regulations may file the complaint on her behalf.

7. Complaint Redressal Procedure

Upon receiving a complaint of Sexual Harassment, the Internal Complaints Committee (ICC) will follow a structured approach to address and resolve the complaint promptly, fairly, and in compliance with the POSH policy.

7.1. Initial Response to Complaint

- 7.1.1. Once the ICC receives a written complaint, it will promptly forward a copy of the complaint and

supporting documents to the Respondent within 7 working days.

7.1.2. The Respondent is required to submit a written reply, along with any relevant documents and a list of witnesses they wish to present, within 15 working days of receiving the complaint copy.

7.1.3. If either the complainant or the Respondent does not appear at the inquiry without good reason, the presiding officer may end the inquiry or proceed with it in their absence, after giving two chances.

7.2. Conciliation Proceedings:

7.2.1. The ICC may attempt to resolve the complaint through conciliation if the Aggrieved woman requests it. During this process, no monetary settlements will be offered as a resolution.

7.2.2. If a mutually agreed-upon settlement is reached, the ICC will document the terms and forward the settlement record to Head HR of SCML for implementation. Both the complainant and Respondent will receive copies of the settlement.

7.2.3. Once a settlement has been achieved through conciliation, the ICC will consider the matter resolved and will cease any further inquiry.

7.3. Inquiry Proceedings:

7.3.1. If conciliation does not result in a settlement, or if the terms of an existing settlement are violated, the ICC will initiate a formal inquiry.

7.3.2. The inquiry will be conducted with at least three ICC members present, including the Presiding Officer, and will follow company procedures for domestic inquiries.

7.3.3. If both the complainant and Respondent are employees, each party will have the opportunity to

present their case during the inquiry, and the ICC will share its findings with both parties to allow for any representations or clarifications.

7.3.4. During the inquiry, the ICC is vested with the powers of a civil court to summon and examine witnesses under oath, require the discovery and production of documents, and take any other necessary actions.

7.3.5. The inquiry proceedings are expected to be completed within 30 days and not later than 90 days.

7.4. Interim Relief Measures:

7.4.1. During the inquiry process, the ICC may recommend interim relief measures if requested by the complainant. Such measures may include:

7.4.1.1. Transferring the complainant or Respondent to another workplace,

7.4.1.2. Granting leave to the complainant up to a period of three (3) months, or

7.4.1.3. Providing other forms of relief as permitted by law and company policy.

7.5. Post-Inquiry Actions:

7.5.1. The ICC shall submit a written report detailing its findings and recommendations to the External Advocate of SCML as soon as possible, and in any case not later than ten (10) days from the completion of the inquiry. A copy of the report will be made available to both the complainant and Respondent.

7.5.2. If the ICC finds the allegations unsubstantiated, it will recommend that no further action be taken.

7.5.3. If the ICC substantiates the allegations, it will recommend appropriate disciplinary actions as per SCML policy against the Respondent, which action may be up to and including termination. Additionally, the

ICC may recommend a deduction from the Respondent's salary as compensation to the complainant, if applicable.

- 7.6. The External Advocate shall initiate necessary actions based on the ICC's recommendations within 60 (sixty days) of receipt of the report of the committee, taking into account the circumstances and seriousness of the offence and shall send the report of the same to the committee.

8. Determination of Compensation

While calculating compensation for an Aggrieved woman, the ICC will consider multiple factors, including:

- 8.1. The mental trauma, pain, suffering, and emotional distress experienced by the Aggrieved woman.
- 8.2. Any career opportunities the Aggrieved woman may have lost due to the incident.
- 8.3. Expenses for physical or psychological treatment incurred by the victim.
- 8.4. The financial situation and income level of the Respondent.
- 8.5. The practicality of providing compensation as a lump sum or in instalments.

9. Actions for False/Malicious Allegations and against Fraudulent Evidence

- 9.1. Internal Complaints Committee (ICC) determines that a complaint was filed maliciously, or that the complainant knowingly submitted false allegations or misleading documents, the ICC may recommend disciplinary action against the individual responsible, which action may include one or more of the disciplinary actions as permissible or based on the ICC's decision.

- 9.2. It should be noted that mere inability to substantiate a complaint or provide sufficient evidence will not, by itself, attract punitive action. Malicious intent must be proven through a formal inquiry process before any recommendation for action is made.
- 9.3. If any witness is found to have provided false testimony or submitted fraudulent documents during the inquiry, the ICC may similarly recommend disciplinary action against that witness.

10. Confidentiality Obligations

All aspects of Sexual Harassment complaints, including the identities of the complainant, respondent, and witnesses, as well as the details of the complaint, inquiry, and conciliation proceedings, are to be strictly confidential under the Prevention of Sexual Harassment (POSH) Act. This confidentiality requirement supersedes the provisions of the Right to Information Act, 2005.

- 10.1. **Protected Information:** The details of the complaint, the identities and addresses of all involved parties, records of conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee (ICC), and subsequent management actions must not be shared or made publicly accessible except where disclosure is required under disciplinary or other remedial processes.
- 10.2. **Disclosure of Resolutions:** Information about the resolution of a complaint may be disseminated if no identifying details of the complainant, respondent, or witnesses are disclosed, ensuring the privacy of all parties involved.
- 10.3. **Breach of Confidentiality:** Any breach of this confidentiality clause by individuals entrusted with managing, processing, or accessing these sensitive details will result in serious disciplinary action.

11. Appeal

- 11.1. Any individual aggrieved by the recommendations of the ICC or by the non-implementation of such recommendations has the right to appeal to the relevant court or tribunal in accordance with the provisions of the service rules applicable to the said person.
- 11.2. If the person does not fall under specific service rules, they may file an appeal according to the provisions outlined in the Act.
- 11.3. Appeals must be filed within ninety (90) days of the ICC's recommendations.

12. Duties of Management

- 12.1. The Head-HR has specific responsibility for overseeing the implementation of this policy within SCML and for updating the Board of the Company on the effective implementation of this policy.
- 12.2. The HR Manager of each establishment/ unit will be responsible to ensure that adequate systems are in place to ensure delivery of this policy and compliance with statutory requirements within their establishment/ units.
- 12.3. SCML will uphold a safe, harassment-free environment for all employees, including implementing measures to protect individuals from inappropriate behavior by any person in the workplace.
- 12.4. SCML will prominently display the guidelines on SHWP, penal consequences of Sexual Harassment, the details of the ICC members, including their names, addresses, and contact information at every branch, regional office and head office of SCML.
- 12.5. It is the duty of SCML to organise regular workshops, awareness programmes and sensitization sessions will be

organized to educate employees on POSH guidelines, along with orientation programs for ICC members as required.

- 12.6. All necessary facilities will be made available to the ICC for handling complaints, facilitating inquiries, and ensuring the proper conduct of proceedings.
- 12.7. SCML will assist in securing the attendance of the Respondent and relevant witnesses before the ICC as needed.
- 12.8. Relevant information will be provided by SCML to the ICC or Local Committee as necessary to ensure a thorough review of the complaint.
- 12.9. Upon request, SCML will assist the Aggrieved woman in filing a complaint under the Bharatiya Nyaya Sanhita (BNS) or other applicable laws.
- 12.10. SCML is dedicated to guaranteeing that no employee who raises a harassment issue faces any type of retaliation, reprisal or discrimination. Any such act will lead to disciplinary measures. SCML will ensure that both the victim and any witnesses are not targeted or discriminated against during the investigation of Sexual Harassment complaints. However, individuals who misuse the process (such as by intentionally making a false allegation) will face disciplinary consequences.
- 12.11. Where appropriate and requested, action will be taken against non-employee perpetrators under the Bharatiya Nyaya Sanhita (BNS) or other relevant laws for incidents occurring within the workplace.
- 12.12. SCML will oversee the timely submission of reports by the ICC to ensure compliance and accountability.

13. Miscellaneous

- 13.1. In case involving multiple locations, one Committee member will travel to the location as needed to verify the facts,

allowing the Committee to thoroughly discuss and assess the complaint.

- 13.2. The Internal Complaints Committee (ICC) reserves the right to terminate the inquiry proceedings or issue an expert decision on the complaint if either the complainant or respondent, without sufficient cause, fails to appear for two consecutive hearings. This termination or expert decision will be made only after providing a 30-days prior notice to the concerned party.

14. Monitoring and Review

- 14.1. SCML's Head-HR is responsible for monitoring the effectiveness of this policy and shall review its implementation on a regular basis. They will assess its suitability, adequacy, and effectiveness.
- 14.2. Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Head-HR .
- 14.3. This policy does not form part of an employee's contract of employment, and SCML may amend it at any time so to improve its effectiveness in grievance.

Annexure I

Internal Complaints Committee

Sl No	Name	Role	Mobile Number & Email ID	Location
1		Presiding Officer		
2		Member		
3		Member		
4		External Member		
5		External		

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		Member		
6		External Member		

