



POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

Statutory Reference	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
Rules Reference	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
Companies Act Ref.	Section 134(3)(e) – Annual Report disclosure requirement
SEBI Reference	Regulation 34(3) read with Schedule V of SEBI (LODR) Regulations 2015

1. Preamble

PCSL is committed to providing a safe, healthy and professional work environment that is free from sexual harassment. This Policy has been formulated pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ('POSH Act') and the Rules made thereunder. The Policy covers all employees, directors, consultants, trainees, temporary staff, visitors and clients at PCSL's workplaces.

2. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour (whether directly or by implication) such as:

- Physical contact and advances.
- A demand or request for sexual favours.
- Making sexually coloured remarks.
- Showing pornography.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Additionally, the following circumstances may also constitute sexual harassment:

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment.
- Creation of a hostile or intimidating work environment.

PROMPT CORPORATE SERVICES LTD.

Shalini Singhaia
Director



3. Complaint and Inquiry Process

1. Filing of Complaint: An aggrieved person may file a written complaint to the Board within 3 months of the incident (extendable by 3 months).
2. Conciliation: The Board may facilitate conciliation between the parties before inquiry, if requested by the complainant.
3. Inquiry: If conciliation is not feasible/successful, the Board shall conduct an inquiry within 90 days.
4. Report: The Board shall submit its findings and recommendations to the Employer within 10 days of completion of inquiry.
5. Action: PCSL shall implement the Board's recommendations within 60 days.

4. Confidentiality

The identity of the complainant, respondent, witnesses, and all related information shall be kept strictly confidential. Violation of confidentiality shall be subject to disciplinary action.

5. Protection against False Complaints

Filing of false or malicious complaints is also prohibited and shall be subject to appropriate disciplinary action. However, mere inability to prove a complaint shall not be treated as a false complaint.

6. Awareness and Training

PCSL shall conduct awareness programs and training for all employees on sexual harassment prevention at the time of induction and at least annually. The Policy shall be displayed on PCSL's website.

7. Annual Report Disclosure

As required under the Companies Act, 2013 and SEBI LODR Regulations, the Annual Report of PCSL shall include information on the number of sexual harassment complaints received and disposed during the financial year.

PROMPT CORPORATE SERVICES LTD.

Shalini Singhaia
Director