

Nangalia Stock Broking Pvt. Ltd.

508, The Stock Exchange Tower, Dalal Street, Fort, Mumbai - 400 001.

CIN NO. : U67120MH1998PTC116886

☎ : +91-22-22722240/41/42 Email: admin@nangaliagroup.in

Anti-Sexual Harassment Policy

Objective

The company is committed to zero tolerance for any act of sexual harassment, act of suppression or distortion of such facts or evidence, and retaliation. Through this anti-sexual harassment policy, the company expresses its commitment to taking all necessary steps to ensure that its employees work in a safe and respectful environment that is conducive to their professional development and promotes equal opportunity.

Scope and Applicability

The policy applies to all employees in the organization, regardless of gender, nature of work, or type of employment (part-time employees or on contract or service providers deployed on the premises). It covers acts occurring within the organization's premises or deemed premises within the organization's control.

Policy

The Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, read with its Rules, 2013 (the "Act"), states that no employee shall be subjected to sexual harassment at any workplace.

Definitions

What Constitutes Sexual Harassment?

Sexual harassment is any unwelcome act or conduct of a sexual nature (whether direct or implied), such as

- Touching, pinching, fondling, kissing, embracing, grasping, and brushing against another employee's body
- Sexually provocative gestures, sounds, statements, jokes, or comments on a person's sexuality
- Displaying pornography

What Constitutes a Workplace?

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A Workplace includes any office or premises of the company or any place visited by the Employee arising out of or during employment, such as (including but not limited to):

(i) transportation provided by or through the company for undertaking a journey arising out of or during employment or

(ii) meetings, conferences, seminars, training sessions, workshops, etc., organized by or through the company.

Who Is an Employee Under the Act?

An employee is a person who is employed at a workplace for any work on a regular, temporary, ad hoc, or daily wage basis, whether directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, whether on a voluntary or other basis, whether the terms of employment are direct or implicit, and may refer to a coworker, contract worker, probationer, trainee, apprentice, or any other designation.

POSH Committee

The committee will be constituted by order of the Internal Complaints Committee (ICC) under the Sexual Harassment at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, and preferably headed by the Director of the Company.

Complaints and Appeals

Any aggrieved employee himself/herself or as provided under the Act can:

- Make a complaint to the Internal Complaints Committee (ICC) within one week from the date of the incident by email, written complaint, or oral complaint.
- Request the ICC to resolve the matter through conciliation, provided that such request is made before the ICC initiates an investigation under the Act.
- Appeal: Any person aggrieved by the ICC report may appeal to the Tribunal as provided under the Act within thirty days from the date of the ICC report.

If the ICC concludes that the complaint was made in bad faith, the ICC will take severe disciplinary action against the complainant, which may be similar to that taken for an act of sexual harassment. The ICC will also take severe disciplinary action against any witness who gives false testimony or provides forged or misleading documents in connection with the complaint.

Responsibilities of the ICC

The ICC shall:

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- Investigate any formal written complaint of sexual harassment.
- Provide the complainant and respondent with a reasonable opportunity to present and defend their respective cases before the ICC.
- Take appropriate remedial action in response to any substantiated allegations of sexual harassment.
- Complete its investigation within seven days of acceptance of the complaint.

The ICC Inquiry Process

The ICC will examine any complaint of sexual harassment by the guidelines prescribed under the Act and will ensure that a fair and just investigation is conducted.

What Action Can the ICC Take?

The ICC may, if it considers it appropriate, recommend the following actions (not exhaustive):

- Demanding a written apology
- Issuing a warning or reprimand
- Dismissal from service
- Deduction of compensation from the offender's salary or wages
- Withholding of promotion, pay increase, or increment
- Ordering counseling or community service
- Taking appropriate legal or regulatory action

Reporting Instances of Sexual Harassment

If you are experiencing or witnessing any form of sexual harassment, whether by a colleague, a customer, or a supplier, you can speak to any of these people:

- The offender: If you suspect that the perpetrator is unaware that they're harassing you, you can talk to them directly to try to resolve the problem.
- Your manager: If your complaint involves customers, stakeholders, or team members, you can contact your manager to assess the situation.
- HR: Do not hesitate to contact Human Resources in any case of harassment, no matter how minor it may seem. For your safety, you should contact Director as soon as possible in cases of serious harassment (e.g., sexual advances) or if your manager is involved in your complaint.

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Special Circumstances and Exceptions

Any deviation from this policy must be approved by Director. Any changes to this policy must be made only after approval from the Legal and Compliance Committee.

Disciplinary Consequences on Account of Non-compliance

Any person (including the witness) who is aware of the incident or who knows the content of the complaint must maintain strict confidentiality. No such information may be published or communicated in any way, including (but not limited to) any publication on the Company's behalf, internal messaging service, email, or other social media. The Company will take strict disciplinary action against any person found to have breached their duty of confidentiality, including the imposition of a penalty as prescribed by law.

THIS CIRCULAR IS VALID FOR ALL THE EMPLOYEES IN THE OFFICE PREMISES ONLY.