

Policy on Prevention Of Sexual Harassment Of Women At Workplace

1.0 Objective and Applicability

Oneview Corporate Advisors Private Limited (hereinafter referred to as "OCAPL", "Company") is committed to creating and maintaining a secure, congenial and nurturing workplace that ensures every employee is treated with dignity and respect and afforded equitable treatment.

OCAPL will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Accordingly OCAPL has framed the Policy on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace (hereinafter referred to as the "Policy"). This Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for redressal of complaints pertaining to sexual harassment. OCAPL is an equal opportunity employer, committed to ensure a safe, secure and congenial work environment for all employees enabling them to render their services without fear of any prejudice, bias and sexual harassment.

This Policy extends to all employees of the OCAPL in India.

2.0 Definitions

- i. Employee: Employee means any person (irrespective of gender) employed at the workplace for any work on regular, temporary, ad hoc, or daily wage basis, either directly, or through an agent, including a contractor, with or without the knowledge of the Company, 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, contract worker, probationer, trainee, apprentice or called by any other such name and visitor who visits the Company premises.

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- ii. Workplace: Workplace shall refer to the following,
 - a) All locations used for execution of work relating to the Company, including all its offices.
 - b) Any external location visited by a person due to or during the course of employment/service contract with the Company, or in pursuance of an activity carried out of course of employment with the Company.
 - c) Any mode of transport provided by the Company (or a representative of the Company) for undertaking a journey to and from the locations aforementioned in sub-clause (a) and (b) of this clause mentioned above.

3.0 What is Sexual Harassment?

"Sexual Harassment" includes such unwelcome sexually determined behavior (whether directly or by implication) as:

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

No employee of OCAPL shall be subjected to or subject any one to Sexual Harassment at the Workplace which may include, but is not limited to:

- i. implied or overt promise of preferential treatment in employment; or
- ii. implied or overt threat of detrimental treatment in employment; or
- iii. implied or overt threat about present or future employment status; or
- iv. conduct of any person which interferes with the work or creates an intimidating or offensive or hostile work environment for any Employee; or
- v. humiliating conduct constituting health and safety problems for any Employee.

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4.0 Grievance Redressal

An Employee who may have any grievance in connection with this Policy is encouraged to deal with any perceived Sexual Harassment directly by asking to the person causing such Sexual Harassment to stop such behaviour. If such efforts are not successful, the Employee must report the incident of perceived Sexual Harassment that the Employee is aware of in writing through the channels mentioned in this Policy.

5.0 Internal Complaints Committee

OCAPL has established “Internal Complaints Committee” (ICC) to deal with Sexual Harassment and associated matters at the Workplace. Initially and till further notice, the ICC will comprise of the following 4 (four) members, out of which at least 3 (three) members shall be women:

Name of ICC Members	Designation in the ICC	Designation in the Company	Contact Number	Email Address
Alka Mishra	Presiding Officer	Senior Vice President	9831032666	alka.mishra@oneviewadvisors.com
Preeti Parikh	Internal Member	Compliance Officer	9769432120	preeti@oneviewadvisors.com
Gaurav Choudhary	Internal Member	Vice President	9830960750	gaurav@oneviewadvisors.com
Adv. Leena Purandare Jail	External Member	-	9823272680	purandareandassociates@gmail.com

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The members have been nominated with effect from 20th December, 2025.

6.0 Grievance Redressal Process

- i. Any aggrieved Employee may make, in writing, a complaint of Sexual Harassment at Workplace to ICC giving details of the Sexual Harassment meted out by such Employee within a period of 3 (three) months from the date of incident and in case of a series of incidents, within a period of 3 (three) months from the date of last incident, which may be extended for a further period of 3 (three) months, if circumstances warrant such extension in the sole opinion of ICC.
- ii. The Presiding Officer or any Member of ICC can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.
- iii. On receipt of complaint, the ICC shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the complainant and respondent. ICC shall follow principle of natural justice while handling such complaints.
- iv. Where the aggrieved Employee is unable to make a complaint on account of Employee's incapacity or any other reason, such complaint may be filed by:
 - a) a relative or friend; or
 - b) a co-worker; or
 - c) any person who has knowledge of the incident,with the written consent of the aggrieved Employee or in such manner as may be acceptable to ICC.
- v. ICC on receipt of such written complaint, may, if require ask the aggrieved Employee to furnish additional information about the alleged Sexual Harassment.

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vi. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to ICC through following mode:

- a) Copy of complaint along with supporting documents and names and address of witness, if any, shall be sent to email addresses of all the ICC members.
- b) On receipt of such complaint, ICC shall provide a copy along with supporting documents of such complaints to the respondent within 7 (seven) working days.
- c) Respondent shall file reply within 10 (ten) working days of receipt of the complaint along with list of documents, names and addresses of witnesses, if any.
- d) ICC shall investigate in detail into the matter of the complaint. ICC shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
- e) ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the respondent or complainant remains absent for 3 (three) consecutive hearings, without sufficient cause.
- f) ICC must complete its investigation within a period 90 (ninety) days from receipt of complaint.
- g) For conducting the enquiry, the quorum of the ICC shall be of 3 (three) members including the Presiding Officer.

vii. ICC may before initiating an inquiry, and at the aggrieved Employee's request, attempt to settle the matter through conciliation. However, ICC shall ensure that:

- a) Monetary settlement will not be made as a basis of conciliation.
- b) Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

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Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.

- viii. ICC during such investigation may exercise the power of a civil court, vested in it, in respect of:
 - a) summoning and enforcing the attendance of any person and examining him under oath;
 - b) requiring discovery and production of documents; and
 - c) any other prescribed matter.
- ix. During such enquiry, upon written request by the aggrieved Employee, ICC may at its discretion recommend:
 - a) to transfer the aggrieved Employee or the respondent to any other Workplace; or
 - b) such other instruction as it may deem fit.
- x. ICC shall on completion of the enquiry provide a report of its findings within 10 (ten) days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
- xi. If the allegation against the respondent has not been proven, ICC may recommend that no action needs to be taken in the matter.
- xii. If ICC arrives at the conclusion that the allegation against the respondent has been proven, it shall recommend necessary disciplinary actions or proceedings on case to case basis.
- xiii. The operation and manner of Grievance Redressal Process shall be at sole discretion and judgment of the ICC.

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- xiv. Such action will be taken within 60 (sixty) days of the receipt of recommendation report.
- xv. Any party aggrieved with the decision can appeal the decision of the ICC within 90 (ninety) days from the date of the recommendations included in the report.

7.0 Ground Rules for Grievance Redressal

- i. All complaints shall be treated with strict and utmost confidence and seriousness, and duly investigated. Names of the complainant and/or members involved will be restricted to the ICC and such other managers strictly on a need-to-know basis.
- ii. The accused will be notified of the filing of the complaint and further, that no act of retaliation or retribution will be tolerated.
- iii. ICC shall ensure a fair, just and speedy investigation.
- iv. All parties concerned, including witnesses, if any, shall be questioned separately, and all attempts shall be made to establish the true facts.
- v. Where the Sexual Harassment at the workplace occurs as a result of an act or omission by any third party or outsider, OCAPL will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- vi. In the event the ICC finds that the degree of offence is such that it violates any penal laws of the land, the ICC may recommend initiation of appropriate action against the offender of Sexual Harassment.
- vii. Notwithstanding OCAPL's internal procedure for action, every Employee reserves the right to take action against the offender in accordance with the law of the land with appropriate authorities.

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8.0 False Accusations

- i. The complaint of Sexual Harassment made by any Employee shall be taken up with utmost seriousness by ICC. However, there shall be zero tolerance for any false accusation.
- ii. If ICC comes to a conclusion that the allegation was made with malicious intent or the aggrieved Employee or any other person making the complaint on behalf of the aggrieved Employee produced false or forged or misleading documents to prove the case, ICC may recommend action to be taken against the Employee who has made the complaint. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that the witness has given false evidence or produced forged or misleading documents.
- iii. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. OCAPL recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

9.0 Employee Obligation and Conduct

- i. All Employees are expected to conduct themselves in accordance with this Policy both in letter and spirit. Every Employee is hereby called upon to ensure and

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uphold the dignity, freedom and respect of each individual and support OCAPL's endeavor to ensure this.

- ii. An Employee who notices any kind of Sexual Harassment against any co-Employee or receives any information in good faith about any kind of Sexual Harassment at the Workplace is also required to report such incidents to a superior or to the HR or any member of the ICC constituted hereunder for further investigation and action.
- iii. Any violation of this Policy by any Employee whether it is directed toward a co-employee, vendor, customer, business partner, visitor or shareowner will result in disciplinary action against such Employee in the manner set out in this Policy.

10.0 Members of the ICC

OCAPL will notify details of the members of the ICC constituted under this Policy to Employees from time to time.

11.0 Power to Amend

OCAPL may review or modify this Policy, if so required, in order to make the enforcement of the Policy more expedient or to accommodate any changes in the law from time to time.