



PREVENTION OF SEXUAL HARASSMENT POLICY (POSH) AT WORK PLACE

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CP CAPITAL LIMITED

(Formerly Known as Career Point Limited)

Registered Office: Village Tangori, Banur, Mohali, Punjab-140601

Corporate Office: CP Tower-1, Road No.-1, IPIA, Kota, Rajasthan-324005

Ph: +91-744-3559282 **Website:** www.capital.in **E-mail:** investors@cpil.in **CIN:** L64990PB2000PLC054497

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1. Introduction:

CP Capital Limited (erstwhile Career Point Limited) (hereinafter referred as “**the Company**” or “**CPCAP**”) a Non-Banking Financial Company (‘**NBFC**’) holding a valid Certificate of Registration (“CoR”) with Reserve Bank of India (‘**RBI**’) vide registration no. B-10.00318 dated April 01, 2025, classified as NBFC - Investment and Credit Company (“**NBFC-ICC**”) under NBFCs-Base Layer (“**NBFCs-BL**”) as per Master Direction- Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2025, with more than twelve (12) years of experience in asset finance business.

2. About the Policy:

This **Policy on Prevention of Sexual Harassment at Workplace ("POSH Policy")** has been framed in accordance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")** and the rules made thereunder, as amended from time to time. The Policy has also been reviewed in line with the evolving corporate governance framework, applicable provisions of the Companies Act, 2013 and other statutory and regulatory requirements, wherever applicable.

The Policy provides a comprehensive framework for the prevention, prohibition and redressal of complaints relating to sexual harassment at the workplace and reaffirms the Company's commitment to providing a safe, secure, inclusive and respectful working environment for all employees. It also lays down the mechanism for prevention of sexual harassment, constitution and functioning of the Internal Committee, inquiry procedures, protection against retaliation, and redressal of complaints in a fair, impartial, confidential and time-bound manner.

While this Policy incorporates the principal requirements of the POSH Act, in the event of any inconsistency or conflict between this Policy and the applicable law, the provisions of the POSH Act, the rules framed thereunder, and any statutory amendment, modification, clarification or judicial interpretation issued from time to time shall prevail.

This Policy has been reviewed and approved by the Board of Directors of **CP Capital Limited** and shall remain subject to periodic review and revision to ensure continued compliance with applicable laws, regulatory requirements and evolving best governance practices.

3. Objective

CP Capital Limited is committed to fostering a professional work environment founded on dignity, equality, mutual respect, diversity and inclusion, where every employee is able to perform his or her duties without fear of sexual harassment, discrimination, coercion, intimidation or retaliation.

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The Company adopts a **zero-tolerance approach** towards sexual harassment and is committed to preventing, prohibiting and effectively redressing any act of sexual harassment through a transparent, fair, confidential and time-bound grievance redressal mechanism in accordance with the provisions of the POSH Act.

The objectives of this Policy are to:

- provide a safe, secure and gender-sensitive workplace for all employees;
- prevent and prohibit sexual harassment in any form at the workplace;
- establish an effective mechanism for receiving, investigating and redressing complaints of sexual harassment;
- ensure fair, impartial and confidential inquiry into complaints while safeguarding the rights of all concerned parties;
- protect complainants, witnesses and members of the Internal Committee from victimization or retaliation;
- promote awareness among employees regarding acceptable workplace behaviour and their rights and responsibilities under the applicable law; and
- ensure continuous compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the rules framed thereunder and other applicable statutory and regulatory requirements.

This Policy shall apply to all employees of the Company, irrespective of their employment status or designation, and shall form an integral part of the Company's terms and conditions of employment. Every complaint or allegation of sexual harassment shall be dealt with promptly, objectively and confidentially in accordance with this Policy and the applicable law.

4. Definitions

- a) **“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 and includes contractual, temporary, visitors.
- b) **“Respondent”** shall mean a person against whom a complaint of sexual harassment has been made by the Complainant.
- c) **“Complainant”** shall mean a woman or a man who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

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- d) **“Employee** shall mean a person employed at the workplace, for any work on regular, temporary, adhoc or daily wage basis, either directly 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 by any other such name
- e) **“Sexual Harassment”** shall mean and refer to any behavior (physical, verbal, written, graphic, electronic, emotional, psychological or through gestures that offend) which has been defined as inappropriate by the Policy, whether intentional or not, which offends the dignity of the person towards whom the behavior is directed will be considered as sexual harassment and shall invite serious disciplinary action. Sexual harassment would, inter alia, mean and include (whether direct or by implication) any of the following:
- a) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any CP Capital Limited activity;
 - b) advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person’s private life or body, signs, insults or taunts based on sex, obscene communication, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
 - c) Eve teasing, innuendos and taunts, unwelcome invitations to go out, suggestive comments or jokes, physical confinement against one’s will and likely to intrude upon one’s privacy;
 - d) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
 - e) Conduct of such an act at work place or outside in relation to an employee of CP Capital Limited, or vice versa during the course of employment;
 - f) Any unwelcome gesture by an employee having sexual overtones;
 - g) Physical contact and advances;
 - h) Staring, leering or unwelcome touching;
 - i) Any unwelcome sexual activity tied to employment decision or benefits; and
 - j) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Behavior that is based on mutual attraction, friendship and respect is not sexual harassment

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5. Applicability:

This Policy applies to all allegations of sexual harassment made by any employee of the Company against another employee irrespective of whether sexual harassment is alleged to have taken place at the Workplace (Workplace shall mean, in addition to the place of work [Head office / Branch offices, Client office where an CP Capital Limited employee may be deputed etc.]). It shall also include any place where the aggrieved woman or the Complainant visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with CP Capital Limited, (including transportation provided for undertaking such a journey). All actions prohibited by this Policy are also applicable to all individuals who are on Company premises or on any other property where the Company conducts its business.

- i. If an individual commits an act in violation of this Policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate against the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he or she had the authority to do so. The complainant needn't be of the opposite sex.
- ii. The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.
- iii. It may occur without economic injury to the complainant.

6. Constitution of Complaints Committee

Complaints of sexual harassment made by female employees shall be dealt with by the Internal Complaints Committee (“ICC”)

- a) Annexure 1 of the Policy provides for constituent members of the ICC.
- b) The ICC should comprise a Chairperson (compulsorily woman), and not less than half of its members should be women.
- c) External member as mandated by law.
- d) In order to cover the various locations of CP Capital Limited, additional members may be co-opted into the ICC as may be decided by the Management from time to time.

7. Procedure for resolution, settlement or prosecution of Acts of Sexual Harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

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- a.) **Informal Resolution Options:** When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter. Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent if requested by the Complainant. It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared. In case a settlement is arrived at, the ICC shall record and report the same to CP Capital Limited for taking appropriate action. Resolution through conciliation should happen within a maximum of two (2) weeks of receipt of complaint. The ICC shall provide copies of the settlement to the complainant and respondent. Once the action is implemented, no further inquiry shall be conducted.
- b.) **Complaints:** An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in the form of a letter, submitted within three (3) months from the date of the incident and in case of a series of incidents, within a period of three (3) months from the date of the last incident. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained. The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of three (3) months. Alternatively, the employee can send a complaint through an email to info@cpcapital.in. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward. Employees may also write directly to the Whistle Officer appointed by the Company at info@cpcapital.in. Complaints against any member of the Complaints Committee or employee in the management cadre should be sent directly to the CMD of CP Capital Limited. If the aggrieved woman is unable to lodge the complaint on account of her incapacity, the following may do so on her behalf, with her written consent.
- i. Legal heir, relative or friend;
 - ii. Co-worker; or
 - iii. Any person having the knowledge of the incident.

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- c) The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within thirty (30) days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons, and communicate the same to the Complainant.
- d) If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- e) Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- f) Manner of inquiry into complaint:
 - a) Complainant should submit the complaint along with supporting documents and the names of the witnesses;
 - b) Upon receipt of the complaint, the committee sends 1 copy of the complaint to respondent within 7 working days;
 - c) Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint
- g) In conducting the inquiry, a minimum of three committee members including the Presiding Officer shall remain present. The Presiding Officer may terminate the inquiry or give an ex-parte decision, if the complainant or respondent respectively is absent for 3 consecutive hearings, without reason. A 15 days' prior written notice shall be given to the absentee party, before termination or ex-parte order. All proceedings of the inquiry shall be documented.
- h) A copy of the final findings is shared with the complainant and the respondent to give them an opportunity to make a representation on the findings to the Committee.
- i) The ICC shall conduct such investigations in a timely manner and the Presiding Officer shall submit a written report containing the findings and recommendations on action to be taken to the management of CP Capital Limited as soon as practically possible and in any

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case, not later than ninety (90) days from the date of receipt of the complaint. The Presiding Officer, Head - Personnel & Administration and the MD of the Company will jointly take decision on the corrective action based on the recommendations of the ICC and keep the complainant informed of the same.

Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the Respondent and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence.
- Where Sexual harassment occurs as a result of an act or omission of a third party, CP Capital Limited shall take all necessary and reasonable steps to assist the Complainant in terms of support and preventive action.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8. Inquiry Report

- a. The ICC shall provide a report of its findings to the Executive Committee within 10 (ten) days from date of completion of the inquiry.
- b. Where the ICC finds that no action is required to be taken, then it shall communicate the same to the Executive Committee.
- c. Where the ICC concludes that the allegation made by the complainant is true, it shall recommend to the Executive Committee:
 - To take action for sexual harassment as per the service rules or
 - To deduct from the salary of the employee as it may consider appropriate to be paid to the aggrieved woman.
- d. Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The Executive Committee shall act within 60 (sixty) days of receipt of recommendation from the ICC.

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9. Manner of taking action against the Complainant

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman/man or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint. The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. However, mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

10. Appeal

Any Complainant aggrieved by the decision of the ICC and implementation by the Executive Committee, may prefer an appeal in accordance with the Act and rules, within ninety (90) days of the recommendations being communicated.

11. Confidentiality

- a) Individuals involved in the complaints process/system should refrain from divulging the details of complaint/any information gathered by them in the course of the inquiry and the identities of the persons involved in the case should not be disclosed. Any breach of confidentiality will be taken seriously and the implications of which shall be disciplinary actions as per the rules of the CP Capital Limited.
- b) Involved parties breaching the confidentiality provisions shall, in addition to the above be liable to penalty. CP Capital Limited shall recover a sum of INR 5,000 (Indian Rupees Five thousand) as penalty from such person.

12. Duties of the Employer

- a) To provide safe working environment to all persons at the workplace;
- b) Display at any place in the workplace, penal consequences of sexual harassment;
- c) Organise workshops and training programs at regular levels;
- d) Provide necessary facilities to ICC and CC for dealing with complaints and conducting inquiries;

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- e) Assist in securing attendance of respondents and witnesses before the ICC or CC;
- f) Provide assistance to a woman if she chooses to file a complaint under the Indian Penal Code or any other applicable law;
- g) Monitor timely submission of reports by the ICC;
- h) And any other assistance required by the ICC, CC or LCC for conducting inquiries into complaints made against sexual harassment.

13. Review of Policy:

The Board shall review and amend this policy as and when required.

If at any point a conflict of interpretation / information between the policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities (“Regulatory Provisions”) arises, then interpretation of the Regulatory Provisions shall prevail.

In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions

Approved by the Board of Directors of CP Capital Limited.

Chairman's Signature:

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ANNEXURE 1**Constituent members of the ICC:**

Committee Members	Designation
Mrs. Neelima Maheshwari	Presiding Officer
Mr. Adv. Manish Binju	Member (Representing NGO/Association committed to the cause of women)
Ms. Dimpy Bajaj	Member
Ms. Nancy Rishiwal	Member

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