CONTINENTAL SECURITIES LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) OF WOMEN AT WORKPLACE

1. Purpose

Continental Securities Limited ("Company") is committed to providing a safe, secure, inclusive and respectful work environment free from sexual harassment. The Company adopts a zero-tolerance approach towards any form of sexual harassment and is committed to ensuring prevention, prohibition and redressal of complaints in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")** and the Rules made thereunder.
This Policy shall be read in conjunction with the applicable provisions of the **Companies Act, 2013**, the **SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**, and other applicable laws.

2. Applicability

This Policy applies to all women associated with the Company, irrespective of their employment status, including permanent, temporary, contractual, probationary, trainee, apprentice, consultant, intern or volunteer, as well as visitors, clients and other persons interacting with the Company.
The Policy applies to all Company workplaces, including registered office, branch offices, project sites, client locations, business travel, meetings, training programmes, conferences, Company-sponsored events and transportation arranged by the Company.

3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour, whether directly or by implication, including but not limited to:

- Physical contact and advances;
- Demand or request for sexual favours;
- Sexually coloured remarks or offensive comments;
- Displaying or circulating sexually explicit material in any form;
- Unwelcome verbal, non-verbal or physical conduct of a sexual nature;
- Repeated unwelcome communication or conduct creating an intimidating, hostile or offensive work environment.

The following circumstances, if connected with such conduct, may also amount to sexual harassment:

- Promise or threat relating to employment benefits;
- Adverse employment consequences;
- Interference with work performance;
- Creation of a hostile work environment; or
- Conduct affecting the dignity, health or safety of the aggrieved woman.

4. Internal Committee (IC)

The Company shall constitute an **Internal Committee (IC)** in accordance with the POSH Act, wherever applicable.

The Internal Committee shall comprise:

- A Presiding Officer who shall be a senior woman employee;
- At least two employee members committed to women's welfare or having legal/social knowledge; and
- One external member having experience in issues relating to sexual harassment.

At least fifty percent of the members shall be women.

The names and contact details of the Internal Committee members shall be displayed at all workplaces and communicated to employees.

Presiding Officer	Ms. MAHIMA KHUTETA
Members	Mrs. PRAVITA KHANDELWAL, Mr. HEMANT GUPTA
External Member	Ms. MAULIKA SAWALKA AGARWAL

5. Complaint and Inquiry

An aggrieved woman may submit a written complaint to the Internal Committee within **three months** from the date of the incident or the last incident. The Internal Committee may extend the period by another three months where sufficient cause exists.

Where requested by the complainant, the Internal Committee may attempt conciliation before initiating an inquiry, provided that no monetary settlement forms the basis of such conciliation.

Where conciliation is not requested or fails, the Internal Committee shall conduct a fair, impartial and confidential inquiry in accordance with the principles of natural justice.

The inquiry shall ordinarily be completed within **90 days**, and the report shall be submitted to the Employer within **10 days** of completion.

6. Interim Relief

During the pendency of the inquiry, the Internal Committee may recommend appropriate interim measures, including transfer of either party, grant of leave to the aggrieved woman, or any other relief permissible under the POSH Act.

7. Disciplinary Action

Where the complaint is proved, the Company shall take appropriate disciplinary action in accordance with the POSH Act, applicable service rules and Company policies, which may include:

- Written apology;
- Warning, reprimand or censure;
- Counselling;
- Withholding promotion or increment;
- Suspension;
- Termination of employment; or
- Any other action deemed appropriate.

Where the complaint is not proved, no adverse action shall be taken against the respondent.
No complaint shall be considered malicious merely because it could not be substantiated. Action against the complainant shall be taken only where malicious intent is established after due inquiry.

8. Confidentiality

The Company shall maintain strict confidentiality regarding the complaint, identity of the parties and witnesses, inquiry proceedings, recommendations and actions taken, in accordance with the POSH Act. Any breach of confidentiality shall invite disciplinary action under applicable law.

9. Responsibilities

The Company shall provide a workplace free from sexual harassment, conduct awareness programmes, constitute the Internal Committee and ensure timely implementation of its recommendations.
Every employee shall maintain professional conduct, treat colleagues with dignity and respect, refrain from acts of sexual harassment, cooperate during inquiries and maintain confidentiality.

10. Reporting and Compliance

The Internal Committee shall submit its Annual Report in accordance with the POSH Act.
The Company shall make disclosures relating to compliance with the POSH Act in its Annual Report and comply with all applicable requirements under the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

11. Appeal

Any person aggrieved by the recommendations or actions taken under this Policy may prefer an appeal before the appropriate authority in accordance with the POSH Act within the prescribed time.

12. Review of Policy

This Policy shall be reviewed periodically by the Board of Directors or whenever required due to amendments in applicable laws. In the event of any inconsistency between this Policy and the applicable law, the provisions of the law shall prevail.

Approved by: Board of Directors
Continental Securities Limited
Version: 1.0
Review Frequency: As and when required or at least once every three years.