



## Kosh

# POSH (Prevention Of Sexual Harassment) Policy

## POSH Policy

Version	2.0
Date of Version	02-02-2026
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Document Classification	Internal

### Revision History

Version No.	Revision Date	Description of Change	Author	Reviewer	Approver
1.0	12-01-2024	Initial Release	Vaibhavi Singh	Vaibhavi Singh	Aayush Goel
2.0	02-02-2026	Second Release	Vaibhavi	Vaibhavi	Sahil

## 1. INTRODUCTION

**Adhikosh Financial Advisory Private Limited (Kosh)**, (hereinafter referred to as Company) is committed to maintaining a work environment where each individual feels respected and safe. This includes a work environment free of sexual harassment, gender bias, and fear of prejudice. Our Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

In response to The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the Act) the Company has introduced a Sexual Harassment Policy (hereinafter referred to as Policy). This Policy is separate from and in addition to policies relating to anti harassment or any such other policy.

This is a gender-neutral company policy and is applicable to all categories of employees, whether permanent or on contract, and at their workplace or client sites. All complaints will be dealt with in a just and fair manner and may have serious consequences. The Company will not tolerate any form of sexual harassment engaged in by clients or by suppliers or any other business associates and is committed to taking all necessary steps to ensure the safety and well-being of all employees and associates.

## **2. SCOPE**

### ***Workplace***

The ‘workplace’ is defined to include office premises and any place visited by the employee arising out of or during the course of employment. The workplace includes:

All offices or other premises where the Company’s business is conducted

Any other site away from the Company’s premises where Company-related activities are performed (example, off-sites or company organized social events)

Any social, business or other events related to the Company’s work where any conduct or comments may have an adverse impact on the workplace or workplace relations

Transportation provided by the Company to undertake a professional journey

### ***Complainant***

The Complainant refers to the individual filing the complaint. This includes anyone associated with the Company in a full-time/part-time capacity as a permanent or temporary employee, contractor, client, partner, consultant, vendor, intern, or volunteer.

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### ***Respondent***

The Respondent refers to the individual against whose actions the complaint has been filed. Thus, referring to anyone associated with the Company in a full-time/part-time capacity as a permanent or temporary employee, contractor, consultant, vendor, intern, or a volunteer.

In a situation where the allegation of sexual harassment is made against a third party, the Company will work

with the direct employer of the alleged offender to decide how the matter should be dealt with.

### ***Internal Committee***

The Company has instituted an Internal Committee (hereinafter referred to as IC or Committee), for redressal of sexual harassment complaints and for ensuring unbiased and time-bound resolution of complaints.

The Internal Committee is responsible for conducting an inquiry into every formal written a complaint of sexual harassment and making recommendations to the Company on the

actions to be taken against the Respondent. The IC will also be responsible for the preparation and submission of the annual report prepared by the IC for each calendar year to be submitted to the District Officer or employer, and maintain a record of such annual reports.

*The names and contact details of the members of the Internal Committee is displayed on the notice board and in this Policy (Please see Annexure). The maximum term of each member of IC shall be 3 (Three) years from the date of their nomination.*

### ***Witness***

*Individuals who have been called upon by either the Complainant, Respondent or Committee to report their statements as part of the inquiry proceedings.*

## **3. DEFINITION OF SEXUAL HARASSMENT**

During the inquiry into an incident, it is ***the impact or effect of the behavior on the Complainant and not the intent of the Respondent that is critical in the IC taking up the case.***

The following unwelcome acts or behaviors, either occurring individually, as a combination of individual acts or collectively may constitute sexual harassment at the workplace (whether directly or by implication) namely: -

- Physical contact and advances
- A demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography

Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment: -

- Implied or explicit promise of preferential treatment in the employment
- Implied or explicit threat of detrimental treatment in the employment
- Implied or explicit threat about the present or future employment status

- Interference with work or creating an intimidating, offensive or hostile work environment Humiliating treatment likely to affect health and safety

In addition to the above, the following acts below are also considered sexual harassment in the workplace. This includes but is not restricted to,

- Unwelcome sexual advances (verbal, written or physical)
- Sexually colored remarks, including but not limited to vulgar/indecent jokes; innuendos or taunts; letters, phone calls, text messages, e-mails with a sexual message and sexually suggestive gestures
- Showing pornographic content or the like
- Any other unwelcome physical, verbal, or nonverbal sexually-oriented conduct, including but not limited to teasing, voyeurism, physical confinement.
- Unwelcome physical contact and advances such as touching, stalking, sounds which might have implicit/explicit sexual connotation/overtones.

**Ignorance of this Policy will not be considered an excuse during an incident.**

#### **4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

##### *i. Management & Team Managers' responsibilities*

- Create and maintain a working environment in which all employees feel respected
- Be alert to observe any inappropriate conduct or comments
- Refer to the Internal Committee in accordance with this Policy, when instances of sexual harassment which occur within the workplace are brought to their attention

##### *ii. Employees' responsibilities:*

- Read and understand the Policy document
- Take reasonable care not to offend co-workers and associates through one's actions or behavior.
- Take responsibility to discourage unwelcome conduct that is offensive, degrading or humiliating. Know who is on the Committee

Cooperate in the inquiry of complaints when called to do so

Maintain confidentiality at all times in the event that you are involved in or have access to information related to any complaint that is raised

#### **5. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT**

The Company is committed to providing a supportive environment in which the concerns of sexual harassment shall be resolved as follows:

##### **a. Written complaint**

When an incident of sexual harassment occurs, a Complainant may make a written complaint to the Presiding Officer or any member of the Committee. The Complainant can file a physical copy of the

complaint through a sealed envelope or send it through an email.

The complaint should be in writing and clearly include:

- The identity, designation of the Complainant and the identity of the Respondent against whom the complaint is being lodged;
- The dates, time and location of the incident or incidents, since these are useful for speedy redressal;
- The identities, designation, contact information of any other employee who may have witnessed the incident (if any);
- Other relevant documented evidence (if available).

The complaint should be made, preferably no later than three months from the date of the incident. If the incidents are continuous or have occurred more than once then the complaint should be made within three months since the most recent incident. The time period of three months for filing the written complaint may be extended by the Committee at its discretion.

## 6. CONCLUSION

In conclusion, **Kosh** reiterates its commitment to providing its employees with a workplace free from sexual harassment, where every employee is treated with dignity and respect.

## ANNEXURE - A

The Internal Committee at **Kosh** is as follows:

Name	Designation	Email Address
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Vaibhavi Singh	Presiding Officer	vaibhavi@getkosh.com
Shivani Sen	Internal Member	shivani@getkosh.com
Mratyunjay Tipathi	Internal Member	mratyunjay@getkosh.com
Kanchan	External Member	kanchan@sarasjurislaw.com

## ANNEXURE - B

### DO'S AND DON'TS

#### DO's

If you have faced sexual harassment in the workplace, we advise you to,

1. Keep a record of incidents (date, times, locations, possible witnesses, what happened, your response, etc.). While the committee understands if you do not have a record of the same, a record of any details can strengthen your case and help you remember details over time.
2. Report incidents of workplace harassment as soon as possible after the incident occurs, as it aids in better recall of the incident and helps the Committee better ensure the employee's safety.

#### DON'Ts

Our company is committed to the safety and wellbeing of all those associated with us. To ensure that the workplace is safe we would like to list the behaviors we expect employee and associates to avoid:

1. Eve teasing;
2. Unwelcome sexual advances or propositions, whether they involve physical touching or not;
3. Comments on personal appearance and individual's body;
4. Sexual comments, innuendoes, gestures, and suggestive or insulting comments;
5. Use of lewd, foul, off-color, sexually-oriented language or "dirty" jokes with sexual implications;
6. Sexual epithets, written or oral references to sexual conduct, gossip regarding one's sex and personal life;
7. Comments about an individual's sexual activity, deficiencies, or prowess;

8. Leering or staring at another's body and/or sexually suggestive gesturing;
9. Whistling, touching, stroking someone's hair, brushing against another's body, pinching, patting, rubbing; grabbing, groping, kissing or fondling another person;
10. Displaying sexually suggestive or explicit objects, posters, pictures, photographs, calendars, cartoons, screen savers or one's own body parts;
11. Sitting obscenely;
12. Direct or implied inquiries into one's sexual experiences;
13. The transmission of a sexually offensive e-mail, voicemail, or instant or text messages;
14. Unwelcome repeated requests for dates or outings;
15. Gender-based insults or sexist remarks;
16. Unwelcome sexual overtone in any manner such as over the telephone (obnoxious telephone calls) and the like such as crank calls, leaving lewd messages on answering machines, SMS, email, or by any other means;
17. Forcible physical touch or molestation and physical confinement against one's will;
18. Other behavior or acts that make the workplace intimidating
19. Gender stereotyping (for example, women only come late and leave early, or women don't do their work properly, et