

**ANTI- SEXUAL HARASSMENT POLICY (the "Policy")**  
**OF**  
**TRUE CREDITS PRIVATE LIMITED**



*This policy was reviewed and approved by the Board of Directors in their meeting held on 13 July 2026.*

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**CHANGE HISTORY**

| Version No. | Effective Date | Changes Made                    | Reason of Change                              |
|-------------|----------------|---------------------------------|-----------------------------------------------|
| 01          | December 2018  |                                 | Initial Release                               |
| 02          | 11.08.2022     | Change in IC members            | Resignation of IC member from employment      |
| 03          | 17.11.2023     | Change in IC members            | Resignation of Rishi Verma from employment    |
| 04          | 08.01.2024     | Document retention clause added | Addition of Document Retention Clause         |
| 05          | 23.01.2024     | Different clauses in the policy | As per audit                                  |
| 06          | 23.12.2024     | Change in IC members            | Resignation of Apurva Singh from employment   |
| 07          | 22.05.2025     | Change in IC members            | Resignation of Bhawna Kaushik from employment |
| 08          | 13.07.26       | Change in IC members            | Change in ICC members                         |

**1. INTRODUCTION TO THE POLICY**

M/s. True Credits Private Limited, (hereinafter referred to as “**Company**” and individually referred to as the “**Company**”) believe that their employees are their prime assets and that they can deliver quality service only if they retain satisfied employees who are treated with dignity and respect. To achieve this, Company creates a positive climate for their employees by providing a workplace free from harassment and discrimination, where employees are respected, and provided an appropriate environment so as to encourage good performance and conduct.

Sexual harassment is a form of discrimination that is offensive, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency and stability of an organization. It is essential that each member of the Company deals with their colleagues and third parties with full fairness and respect and realize that his/her behavior will be attributed to the Company and its reputation.

This Policy has been framed to apprise members of the Company about sexual harassment and explain what they can do if they encounter or observe it. Company assures all its

members that each complaint of sexual harassment will receive an adequate, reliable, and impartial investigation and appropriate corrective action. Company emphasises that any form of sexual harassment is unacceptable and regarded as misconduct as per this Policy.

## 2. ABOUT THE POLICY

Company adheres to all applicable labour and employment laws and those laws that pertain to the elimination of any improper employment discrimination. After the landmark judgment of the Supreme Court of India in August 1997 (Vishaka & others vs. the State of Rajasthan & others), recently the anti-sexual harassment law of India i.e. the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**Act**”) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the “**Rules**”) have come into force with effect from December 9, 2013.

Company has put its best efforts in preparing this Policy as per the prevailing law and has made it an easy to use summary for ease and reference. In the event that any Employee has any question/concern with regard to understanding the content of this Policy, they should not hesitate in seeking clarification from the Human Resources (the “**HR**”) representative or the Director of the Company. Company reserves the rights to modify this Policy, as and when required, in whole or in part and the same shall be communicated to the Employees.

## 3. APPLICABILITY OF THE POLICY

This policy shall be applicable to all employees of the Company and its offices located anywhere in India. It includes all categories of the employees i.e. permanent, contract, trainees, and temporary appointees. They can be regular, temporary, adhoc or daily wage basis employees. This includes contract workers, consultants, retainers, probationers, trainees, and apprentices or any one called by any other such name engaged by the Company. They could be appointed either directly or through an agent including a contractor. It could be with or without knowledge of the Company. The terms of employment could be expressed or implied. (All the above stated personnel are hereinafter referred to as the “**Employee**”).

This Policy is deemed to be incorporated in the service conditions of all Employees explicitly or by inference and will come into effect immediately. It is mandatory for all parties connected with the Company (and/or visiting the Company) to follow this Policy and to work in collaboration to prevent sexual harassment.

## 4. DEFINITIONS

Please note that the definitions herein below are based on the definitions provided in the Act and the Rules.

- a) “**Aggrieved Woman**” means a woman of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- b) “**Complaints Committee**” means the ICC or the LCC, as the case may be.
- c) “**Employer**” means and includes any person responsible for the management, supervision and control of the Workplace (management includes the person or board

or committee responsible for formulation and administration of policies for such organisation).

- d) **“Incident”** means an incident of Sexual Harassment.
- e) **“ICC”** means an Internal Complaints Committee constituted by the Company.
- f) **“LCC”** means the Local Complaints Committee constituted under the Act.
- g) **“Member”** means a member of the ICC or the LCC.
- h) **“Respondent”** means a person against whom the Aggrieved Woman has made a complaint.
- i) **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):
  - a) physical contact and advances; or
  - b) a demand or request for sexual favours; or
  - c) making sexually coloured remarks; or
  - d) showing pornography; or
  - e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If any of the following circumstances, (including but not limited to), occurs or is present in relation to or connected with any act or behaviour of sexual harassment (i.e. there is creation of a hostile work environment), it may also amount to Sexual Harassment:

- a) direct or indirect promise of preferential/special treatment in her employment; or
  - b) direct or indirect threat of detrimental treatment in her employment; or
  - c) direct or indirect threat about her present or future employment status; or
  - d) interference with her work or creating an intimidating or offensive or hostile work environment for her (even if this effect was not intended by the person responsible for the conduct); or
  - e) humiliating treatment likely to affect her health or safety.
- j) **“Workplace”** includes all office(s) of Company and/or any place visited by the Employee during the course of employment, such as official functions/events, conferences and training programs, and such transportation as provided by the Employer for undertaking such journey.

## 5. ORGANIZATION’S RESPONSIBILITIES

Organization will ensure:

- a) That this Policy is issued and communicated to all the Employees of the Company.

- b) To Provide education and legal counseling, and to organize workshops and awareness programs for the Employees at regular intervals to explain the requirements of this Policy and the applicable law.
- c) That the Employees have an understanding of various situations of unacceptable or unwelcome behaviour.
- d) Display at a conspicuous place in its offices, the penal consequences of Sexual Harassment, and the order constituting the ICC along with the details of the members of the ICC.
- e) Maintain strict confidentiality at all times with regard to the complaint made by the Aggrieved Woman, the identity and address of the Aggrieved Woman, Respondent and the witnesses, any information relating to conciliation and inquiry proceedings, and recommendations of the ICC or the LCC. Further, the Company shall ensure that the same is not published, communicated or made known to the public, press and media in any manner.
- f) To Organize orientation programs, seminars and capacity building and skill building programs for the members of the ICC.
- g) To initiate action, under the Indian Penal Code, 1860, or any other law for the time being in force, against the Respondent, or if the Aggrieved Woman so desires, where the Respondent is not an Employee in the Workplace at which the incident of Sexual Harassment took place.
- h) To Provide assistance to the Aggrieved Woman if she chooses to file a complaint in relation to the offence under the Indian Penal Code, 1860, or any other law for the time being in force.
- i) Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.
- j) To Assist in securing the attendance of the Respondent and witnesses before the ICC.
- k) To Make available such information to the ICC as it may require having regard to the complaint made by the complainant.
- l) To Cooperate with the conduct of inspection of the records by the officer authorized by the government in relation to Sexual Harassment.
- m) To Treat Sexual Harassment as a 'misconduct' under the Company's service rules and regulations/policies and initiate action for such misconduct.

- n) To Take action against the Aggrieved Woman/complainant who makes a malicious complaint against the Respondent, or any other person who has produced any forged or misleading documents, as per the Company's rules and regulations/policies.
- o) That the ICC submits timely reports to the concerned District Officer.
- p) To Include in the annual report of the Company, the total number of cases filed, if any, and their disposal under the Act and submit the same to the concerned District Officer.

## 6. COMPLAINT MECHANISM

### 6.1 Complaint Forums

In case of an Incident of Sexual Harassment taking place at the Workplace, the Aggrieved Woman may approach the ICC to report such complaint and seek inquiry and redressal thereof in the manner stipulated hereunder. Where the Sexual Harassment is caused by the Employer himself, the Aggrieved Woman may approach the concerned LCC constituted under the Act. The Aggrieved Woman is also entitled to avail the remedies provided under the criminal law or any other law for the time being in force.

### 6.2 Composition of the ICC

- (i) The following are the Members of the ICC, as nominated for the Company:

| S no | Name                  | Designation                                   | Contact No. | Email ID                                                               |
|------|-----------------------|-----------------------------------------------|-------------|------------------------------------------------------------------------|
| 1    | Neha Arora            | Presiding Officer<br>(Deputy General Manager) | 9810629339  | <a href="mailto:icc@truecredits.in">icc@truecredits.in</a>             |
| 2    | Ishita Sharma         | Member<br>(Assistant General Manager)         | 8447485842  |                                                                        |
| 3    | Rohit<br>Shrivastav   | Member<br>(Chief Compliance Officer)          | 9769155127  |                                                                        |
| 4    | Mamta Rani            | Member<br>(Associate Manager)                 | 7982119965  |                                                                        |
| 5    | Ajeet Singh<br>Parmar | Member<br>(Senior General Manager)            | 7503224505  |                                                                        |
| 6    | Jyoti Grover          | External Member                               | 9810071537  | <a href="mailto:jyoti@counselquest.co.in">jyoti@counselquest.co.in</a> |

- (ii) At all times, at least one half of the total Members of the ICC shall have to be women.

- (iii) The Presiding Officer and every Member of the ICC shall hold office continuously for not more than three (3) years from the date they were nominated.
  - (iv) The Presiding Officer/ Chairperson, shall be a senior level woman employee at the concerned office/unit.
  - (v) The external Member shall be paid such fees or allowances for holding the proceedings of the ICC, by the Company, as prescribed under the Rules.
  - (vi) The Presiding Officer or Member, as the case may be, shall be removed from the ICC, in case the said Presiding Officer or Member of the ICC:
    - publishes or communicates to the public, press or media, the contents of the complaint of Sexual Harassment or the inquiry proceedings, etc.; or
    - has been convicted for an offence, or an inquiry into an offence under any law for the time being in force is pending against him/her; or
    - has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
    - has so abused his/her position as to render his continuance in office prejudicial to the public interest,
- In such scenario, the vacancy created by such removal shall be filled by fresh nomination by the Company.
- (vii) In any event, the ICC shall, hold at least one (1) meeting every year and prepare an annual report and submit the same to the Company and to the District Officer.
  - (viii) Appointment and reappointment of IC members can be done by CHRO under intimation to Company Secretary for board intimation purpose.

### 6.3 Complaint Resolution

#### **(i) Confronting, Counselling and Support**

- a) Any person observing any incident of sexual harassment in the workplace shall act as an active bystander and should attempt to indicate to the person indulging in the sexually offensive behaviour that the behaviour is unwelcome and specifically request him to stop the behaviour. It may be that the individual does not realise the effect that his behaviour is having and will change his conduct or actions when asked.
- b) The Company should provide for a safe environment and should encourage post incident counselling by experts.
- c) While writing a complaint, the Aggrieved Woman should maintain a record of Incidents (date, time, locations, possible witnesses, what happened, one's response

etc.). A record can strengthen the case and help the complainant remember details over time.

## **(ii) Complaint of the Incident, Conciliation and Inquiry by the ICC**

### **a) Procedure**

- (1) The Aggrieved Woman may make a complaint of Sexual Harassment, in writing, to the Complaints Committee, within a period of three (3) months from the date of the Incident of Sexual Harassment or in case of a series of Incidents of Sexual Harassment, within a period of three (3) months from the date of the last Incident. In the event that the Aggrieved Woman is unable to make aforesaid complaint in writing, she has a right to seek reasonable assistance from the Presiding Officer or any Member of the ICC, or the Chairperson or any Member of the LCC, for making such a complaint in writing.
- (2) In the event that the Aggrieved Woman is prevented from making the aforesaid complaint within the stipulated time period as stated above, the Complaints Committee may extend the time limit for a period not exceeding three (3) months, only if it is satisfied that the Aggrieved Woman was prevented from making the complaint due to justifiable circumstances and the same needs to be provisioned in writing along with the complain.
- (3) In case the Aggrieved Woman is unable to make a complaint herself:
  - **due to her physical incapacity**, then the complaint may be filed by her relative; or friend; or her co-worker or an officer of the National Commission for Women or State Women's Commission; or any person who has knowledge of the Incident, with the written consent of the Aggrieved Woman.
  - **due to her mental incapacity**, then the complaint may be filed by her relative or friend; or a Special Educator (i.e. a person trained in communication with people with special needs in a way that addresses their individual differences and needs); or a qualified psychiatrist or psychologist; or the guardian or authority under whose care she is receiving treatment or care; or any person who has knowledge of the Incident, jointly with her relative or friend or a qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
  - **due to any other reason**, then the complaint may be filed by any person who has knowledge of the Incident, with her written consent.
  - **due to her death**, then a complaint may be filed by any other person who has knowledge of the Incident, with the written consent of her legal heir.

### **b) Conciliation**

- (1) The purpose of the Complaints Committee is to resolve/redress the complaint of the Aggrieved Woman. Firstly, the ICC shall make an attempt to resolve the complaint through mutual discussion between the Aggrieved Woman and the Respondent (the “Parties”). The mutual discussion/conciliation will be considered only upon a request by the Aggrieved Woman.
- (2) The ICC shall hold the first meeting for mutual discussion between the Parties within seven [7] days of receipt of the complaint as made under clause (1) above by the Aggrieved Woman. During the process of conciliation, the ICC will endeavour to resolve the matter and reach an amicable conclusion by means of meetings and discussions. No monetary settlement shall be the basis of such conciliation.
- (3) If the Parties arrive at a settlement, the Complaints Committee shall record the settlement so arrived at and forward the said settlement to the Company or to the District Officer, as the case may be, for its necessary action. Copies of such settlement shall also be made available to both the Parties.
- (4) In the event that any term or condition of the aforesaid settlement has not been complied with by the Respondent, or the terms of conciliation are not being agreed upon by the parties, the Complaints Committee would be required to initiate an inquiry into the complaint as per clause (3) below.

#### c) Inquiry into the Complaint

In case of the situations where the Aggrieved Woman does not want to proceed for conciliation, or if the terms of conciliation are breached by either party, the Complaints Committee shall proceed to initiate inquiry into the complaint in the manner provided hereunder.

- (1) The Aggrieved Woman/complainant shall submit to the Complaints Committee, six (6) copies of the complaint along with supporting documents, and the names and addresses of the witnesses. The Aggrieved Woman may also file the complaint by way of an email addressed to the Presiding Officer on the official IC email Id’ which is [icc@truecredits.in](mailto:icc@truecredits.in).
- (2) On receipt of the complaint, the Complaints Committee shall send one of the copies of the complaint received to the Respondent, within a period of seven (7) working days.
- (3) The Respondent shall file his reply to the complaint, along with his list of documents, and names and addresses of witnesses, within ten (10) working days from the date of receipt of the copy of the complaint.
- (4) The Complaints Committee shall make inquiry into the complaint in accordance with the principles of natural justice.

- (5) The Complaints Committee shall have the right to terminate the inquiry proceedings or give an *ex-parte* decision on the complaint, if the Aggrieved Woman/complainant or the Respondent fails, without sufficient cause, to be present for three (3) consecutive hearings convened by the Presiding Officer of the ICC or the Chairperson of the LCC, as the case may be. However, such termination or *ex-parte* order may not be passed without giving a notice in writing, fifteen (15) days in advance, to the party concerned.
- (6) The Parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee.
- (7) In conducting the inquiry, a minimum of three (3) Members of the ICC, including the Presiding Officer, or the LCC, including the Chairperson, as the case may be, shall be present.
- (8) For the purpose of making the inquiry, the Complaints Committee may summon and enforce the attendance of any person and examine him/her on oath, or require discovery and production of documents.
- (9) During the pendency of the inquiry, on a written request by the Aggrieved Woman, the Complaints Committee may provide her with interim relief in the form of (a) transfer the Aggrieved Woman or the Respondent to any other Workplace; or (b) grant leave to the Aggrieved Woman up to a period of three (3) months (in addition to the leaves that she is otherwise entitled to); or (c) restrain the Respondent from reporting on the work performance of the Aggrieved Woman. The Company shall implement the said interim reliefs and apprise the Complaints Committee of the same.
- (10) At all times, the formal inquiry shall be completed within a period of ninety (90) days.

d) Inquiry Report and Penalties for Violation

- (1) The Complaints Committee shall submit a report of its findings to the Company or to the District Officer, as the case may be, within ten (10) days from the date of completion of the inquiry. Such report shall also be made available to both the Parties.
- (2) If the Complaints Committee arrives at the conclusion that the allegation against the Respondent has not been proved, then it shall recommend to the Company or to the District Officer, as the case may be, that no action is required to be taken in the matter.

- (3) If the Complaints Committee arrives at the conclusion that the allegation against the Respondent has been proved, then it shall recommend to the Company or to the District Officer, as the case may be, to:
- take action for Sexual Harassment as a 'misconduct' in accordance with the rules and regulations of the Company, or the appropriate recommendations as mentioned through the statute, the code of conduct of the company and/or
  - deduct from the salary or wages of the Respondent, such compensation as it may consider appropriate to be paid to the Aggrieved Woman or her legal heirs, as the case may be.
- (4) While deciding the compensation to be paid to the complainant, the Complaints Committee shall have regard to (a) the mental trauma, pain, suffering and emotional distress caused, and/or loss in the career opportunity due to the Incident of Sexual Harassment, (b) medical expenses incurred by the Aggrieved Woman for physical or psychiatric treatment, (c) the income and financial status of the Respondent, and (d) feasibility of such payment in lump sum or in installments.
- (5) The Company or the District Officer, as the case may be, shall comply with the recommendations provided by the ICC or the LCC in its report within sixty (60) days of receiving the same.

e) Appeal

Any person aggrieved by the recommendations made by the Complaints Committee, or non-implementation of such recommendations, may appeal within a period of ninety (90) days of such recommendations to the concerned appellate authority notified under section 2(a) of the Industrial Employment (Standing Orders) Act, 1946.

## **7. FALSE AND MALICIOUS COMPLAINTS**

The Company strongly opposes misuse of this Policy.

Where the Complaints Committee arrives at a conclusion that the (a) allegation against the Respondent is malicious; or (b) the Aggrieved Woman or any other person making the complaint has made the complaint knowing it to be false; or (c) the Aggrieved Woman or any other person has produced any forged or misleading documents, then the Complaints Committee may recommend to ICC or to the District Officer, as the case may be, suitable action against the aggrieved woman in line with the code of conduct and the severity of the allegations. In such cases, the Aggrieved Woman will be liable for appropriate disciplinary action by the Company.

Similarly, if the Complaints Committee determines that during the inquiry, any witness has given false evidence or produced any forged or misleading documents, then the Complaints Committee may recommend to the employer of the witness or to the District Officer to take action against the said witness as per the rules and regulations applicable to the said witness.

## **8. NO RETALIATION**

The Company observes zero tolerance to retaliation/reprisal against the Aggrieved Woman/complainant or person who, in good faith, has participated in or provided information pertaining to incident/s of Sexual Harassment. Any act of retaliation/reprisal should be reported to the manager of the HR department or/and Directors of the Company and will be subject to disciplinary action by the Employer.

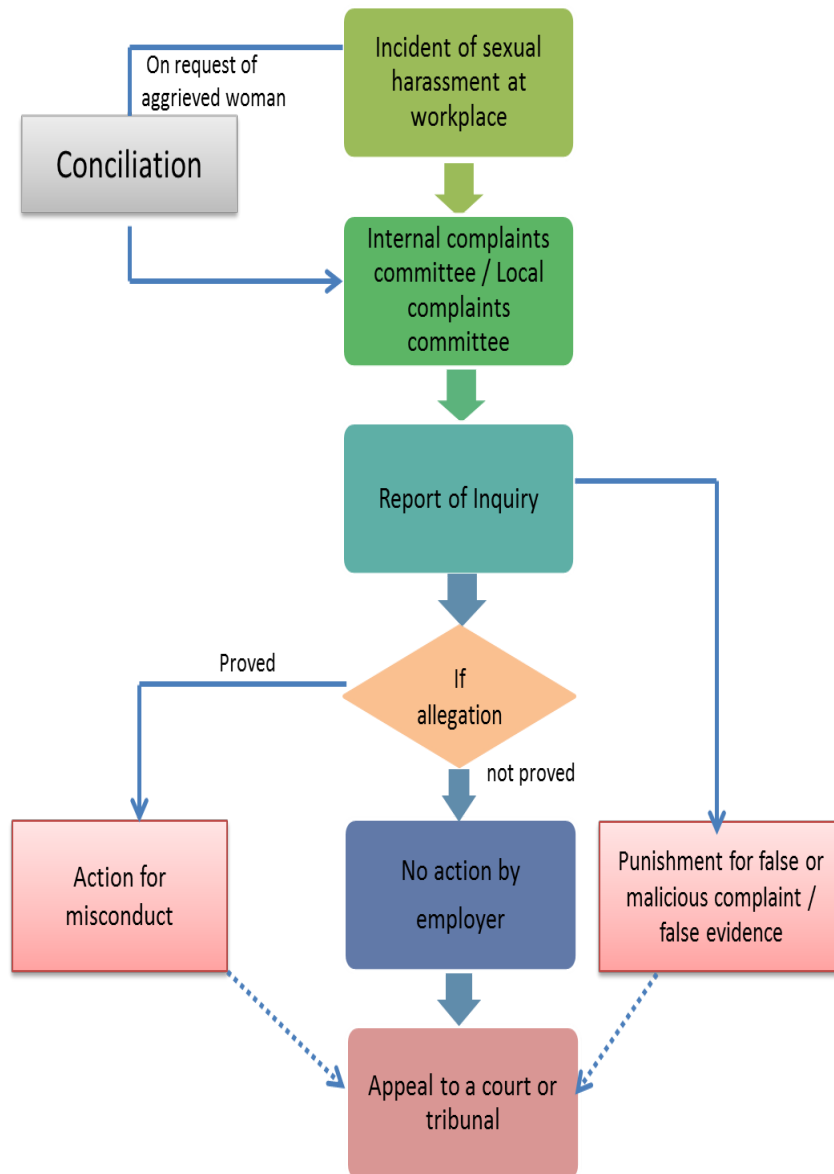
## **9. CONFIDENTIALITY**

The Company will maintain strict confidentiality at all times with regard to the complaint made by the Aggrieved Woman, the identity and address of the Aggrieved Woman, Respondent and the witnesses, any information relating to conciliation and inquiry proceedings, and recommendations of the Complaints Committee.

Further, the Company shall ensure that the above information is not published, communicated or made known to the public, press and media in any manner. In the event that any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations to be taken under the Act contravenes the said requirement, then such person shall be liable for appropriate action under the statute and in accordance with the Company Employees Handbook.

## **10. DOCUMENT RETENTION**

The Company shall retain all documents related to any Sexual Harassment allegation as per the Information Security policy of the organization.

**PROCESS FLOW CHART****Timelines**

- A written complaint has to be filled by the female employee within 3 months of the date of the incident.
- The inquiry has to be completed within 90 days.
- The inquiry report has to be issued within 10 days from the date of completion of inquiry.
- Employer is required to act on the recommendations of the committee within 60 days of receipt of inquiry report.
- Appeal against the decision of the committee is allowed within 90 days of the date of recommendations.

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