



Alternatives
Aligned with your interests

Policy on Sexual Harassment of Women at Workplace

(UAPL/POSH/V1/09/2025)

(Last reviewed in Board Meeting held on January 27, 2025)

Policy on Prevention of Sexual Harassment of women at workplace

1. Background:-

UTI Alternatives Private Limited (“UAPL”) has formulated this policy in line with the Sexual Harassment of women at workplace (Prevention, Prohibition & Redressal) Act — (No 14 of 2013) along with the Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Rules, 2013. (Hereinafter referred to as “Act” and “Rules” respectively).

The UAPL as a professional organization and an equal opportunity employer ensures that all its policies & practices are non-discriminatory and followed without any discrimination based on gender, caste, creed, religion, region etc. and aimed towards improving the operational efficiency of the company and to provide a safe, secure and congenial work environment to the staff.

2. Scope, definition and application of this policy:

This policy will apply to all the employees of UAPL. The various words, definitions and meaning shall be as per the said Act and Rules as amended from time to time.

3. Meaning of Sexual Harassment:

The meaning of sexual harassment will be as defined in the said Act and Rules from time to time. The definition as per Section 2 (n) and Section 3 of the Act is as under:

“Section 2(n) — “Sexual Harassment” includes any one or more the following unwelcome acts or behaviour (whether directly or by implication) namely:-

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

“Section 3 - Prevention of sexual harassment - (1) No woman shall be subjected to sexual harassment at any workplace.

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:

- i. Implied or explicit promise of preferential treatment in her employment; or
- ii. Implied or explicit threat of detrimental treatment in her employment; or
- iii. Implied or explicit threat about her present or future employment status; or
- iv. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. Humiliating treatment likely to affect her health or safety.”

4. Constitution of Internal Complaints Committee (ICC) & Complaint Mechanism:

- a. The UAPL shall constitute an ICC in line with said Act and Rules to take up and enquire into the cases of sexual harassment of women at workplace. The ICC shall enquire into complaints received from employees of the Company. The ICC may also make use of Video conferencing / telephone facility to interact with aggrieved women/ complainant/ others wherever required.

In terms of section 4 of the Act, the Internal Committees shall consist of the following members:-

- A. Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees. *Ms. Nivedita Yadav, Associate Principal – Investment of the Company shall be the Presiding Officer.
- B. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge. Mr. Rohit Gulati, CEO and Mr. Shaurya Arora, CIO shall be these two members.
- C. One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. CEO has the authority to nominate this person on the ICC.

Provided that at least one-half of the total Members so nominated shall be women.

b. Timeliness for initiating a complaint/ resolution etc.:

Submission of complaint: The aggrieved women shall submit a written complaint to any one of the members of the ICC at the earliest and in any case within 3 months from the date of occurrence of the alleged incident/ last of the series of incidents. The complaint shall contain all details including the name of the respondent (i.e. the person against whom complaint is made). If the aggrieved woman is unable to make complaint due to her physical/ mental incapacity such a complaint may be made by her co-worker/ relative / friend etc. The ICC for the reasons to be recorded in writing may extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such which prevented the aggrieved woman from filing the complaint within the said period.

Conciliation: The ICC may at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.

Timeline for enquiry and submission of report: If there is no conciliation, the enquiry by ICC shall be completed within 90 days. The confidentiality of the identity of the parties involved shall be maintained and shall not be made public. The ICC is entitled to elicit and summon all forms of evidence in the course of the enquiry. The ICC shall provide a report of its finding to the employer (i.e. Competent Authority under Staff Rules) within 10 days of the completion of the enquiry and such report shall be made available to the parties concerned.

If the ICC arrives at a conclusion that the allegation against respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.

**Mrs. Nivedita Yadav was appointed as Presiding officer in place of Ms. Ayushi Mittal vide Board approval dated October 17, 2025.*

If the ICC arrives at a conclusion that the allegation against the respondent has been proved, it shall recommend to the employer:

- To take action for sexual harassment as a mis-conduct under UAPL Staff Rules
- To deduct from salary of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman in accordance with the Section 15 of the Act.

If the ICC arrives at a conclusion that the allegation of the aggrieved woman against the respondent is malicious or made knowing it to be false or on misleading/ forged document etc., then the ICC may recommend to the employer action against the aggrieved woman.

The employer (i.e. Competent Authority) shall act on the recommendation of ICC within 60 days from its receipt. Notwithstanding contained anything in Right to Information Act, 2005, the content of the complaint, identity /address of the aggrieved woman, respondent, witness, information on the enquiry, action taken by employer etc. shall not be published or made known to public/ media etc. However, the information may be disseminated regarding justice secured to any victim of sexual harassment without disclosing name, identity of the persons concerned/ witness etc.

5. **Appeal:** Any person aggrieved by the recommendation of the ICC may prefer an appeal within 90 days as per the service rules applicable to the said person (i.e. Appellate Authority under the UAPL Staff Rules).
6. **Others:** The UAPL shall organize awareness programs for sensitizing the employees and take other measures as required under the Act/ Rules.