

Prevention of Sexual Harassment (POSH) Policy

Prepared by: HR Department

Approved by: Board of the Company

Approval Date: 08.05.2025

Purpose: Created and Amended from time to time to create a safe and respectful working environment by preventing and addressing any form of sexual harassment.

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Regd. Office: No.32, Ground Floor, Ambica Complex, N.S.K Salai, Kodambakkam, Chennai - 600024

CIN NO: U65999TN2021PTC143375 GST No. 33AAVCA1981G1ZG

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1. Introduction:

Ardent Capital Private Limited (the Company) is committed to maintaining a workplace free from sexual harassment, fostering an environment of dignity, respect, and equality. This policy is in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and any other applicable laws in India.

2. Policy Statement:

Ardent Capital strictly prohibits any form of sexual harassment and considers it a grave violation of ethical standards. All employees are expected to adhere to the principles of this policy, ensuring a safe and harassment-free workplace.

3. Scope:

This policy applies to all employees including permanent, temporary, contractual, as well as business connectors, within the premises of Ardent Capital or during work related events, including off-site meetings, conferences, or social events organised by the Company.

4. Definition of Sexual Harassment:

According to the POSH Act, sexual harassment includes any unwelcome conduct of a sexual nature, such as unwelcome sexual advances, demand or requests for sexual favours, sexually coloured remarks, showing pornography or any other form of physical, verbal, or non-verbal conduct of a sexual nature.

5. Responsibility and Roles:

a. Employees:

All employees are required to comply with this Policy and report any incidents of sexual harassment. Employees should treat each other with dignity and respect at all times.

b. Human Resources (HR):

The HR Department will provide training, awareness programs, and a safe reporting mechanism for complaints. HR will support the ICC and assist in implementing this Policy effectively.

c. Internal Complaints Committee (ICC):

The ICC will be responsible for receiving, investigating, and resolving complaints of sexual harassment in a confidential, fair, and timely manner. The ICC will consist of senior employees and external experts, as required, to maintain neutrality and ensure a fair process.

6. Reporting Procedure:

a. Internal Complaints Committee (ICC):

Ardent Capital has constituted an Internal Complaints Committee (ICC) as mandated by the law. The ICC is responsible for addressing complaints related to sexual harassment.



The ICC comprises the following members:

Chairperson (Presiding Officer): A senior female employee.

One External Member: A person from an NGO or any other organization committed to the cause of women or those with experience in social work or legal knowledge, ensuring an external and unbiased perspective.

The Chairperson and members will be appointed for a term of three years and will be eligible for reappointment.

b. Procedure for Filing Complaints:

Employees who experience or witness sexual harassment are encouraged to report the incident immediately. Complaints can be made in writing or verbally to any member of the Committee. Contact details of the Committee members enclosed as Annexure A. The complaint should include details such as the nature of the incident, date, time, and names of the parties involved.

c. Confidentiality:

All complaints will be treated with the utmost confidentiality. The identity of the complainant, the accused, and the witnesses will be disclosed only on a need-to-know basis during the investigation.

7. Investigation Procedure:

Upon receiving a complaint, the ICC will acknowledge it and conduct a prompt and impartial investigation of the complaint. Both the complainant and the accused will be given an opportunity to present their case and provide evidence during the investigation.

The ICC will maintain confidentiality throughout the investigation process to protect the identity of the complainant, the accused, and any witnesses involved. Information will only be disclosed to those who need to know for the purpose of investigation.

The ICC will interview the complainant, the accused, and any witnesses identified during the investigation. All statements will be recorded, and relevant documents or evidence will be collected. The investigation will be completed within a reasonable timeframe.

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If necessary, the ICC may recommend interim measures to ensure the safety and well-being of the complainant or others involved. These measures may include a temporary transfer, change in reporting structure, or any other appropriate action.

The ICC will recommend the final decision, along with appropriate disciplinary actions if the complaint is substantiated, to the Managing Director (MD) for approval. The MD will be responsible for issuing the final decision.

8. No Retaliation:

The company strictly prohibits retaliation against any employee who reports an incident of sexual harassment. Any form of retaliation will be treated as a serious violation of company policy and will result in disciplinary action.

9. Awareness and Training:

Ardent Capital is committed to raising awareness about sexual harassment and providing regular training to employees to prevent and address such incidents. Regular training will be provided to all employees to raise awareness about sexual harassment, the right of individuals, and how to report harassment. New employee will receive training during their on boarding process.

10. Review and Revision:

This policy will be reviewed by the Board of the Company periodically to ensure its compliance with applicable laws and effectiveness in preventing sexual harassment within the organization.

11. Conclusion:

The Company is dedicated to fostering a workplace culture free from sexual harassment. By adhering to this policy, we aim to create an environment where all employees feel safe, respected, and valued.

Approved by

Board of the Company

ARDENT CAPITAL PRIVATE LIMITED



SIVARAMAN S

MANAGING DIRECTOR

DIN:08788060



ardent capital pvt ltd

Annexure – I

Constitution of Internal Complaints Committee

<u>No.</u>	<u>Name of the Member</u>	<u>Designation</u>	<u>Appointment date</u>
01	Mrs. Deepika M	Presiding Officer	29.02.2024
02	Mr. A Manikandan	Employee Member	08.05.2024
03	Ms. Hetal Unadkat	Employee Member	11.11.2024
04	Ms. Sindhura Kumaran	External Member	11.11.2024

History of the Prevention of Sexual Harassment (POSH) Policy

Version No.	Effective Date	Description of changes	Approved by
Version 1.0	16.10.2023	Initial release of the Policy	Board of the Company
Version 2.0	29.02.2024	To revised the policy for better Clarity, effectiveness and compliance and to update the Internal Complaints committee	Board of the Company
Version 3.0	18.01.2025	To revised the policy for better Clarity, effectiveness and compliance and to update the Internal Complaints committee	Board of the Company
Version4.0	08.05.2025	To update the Internal Complaints committee	Board of the Company

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