

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Objective	This Policy is in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013. It encapsulates the position of Paragon Advisor Partners LLP ("Paragon") on employee harassment. It aids in maintaining a working environment that is comfortable and free of sexual harassment.
Rationale & Scope	"Policy" or "This Policy" means, Policy on Prevention of Sexual Harassment. The purpose of This Policy is to set the steps that Paragon shall implement to identify and cease any unwelcome behaviour of a sexual nature towards any Partners and/or employees of Paragon; by any Partners or employees, customers, consultants, visitors, vendors, contractors or any other non-employees during the course of a business relation.
Applicability	This Policy shall be applicable to the Partners and all the employees of Paragon, including permanent management, temporary appointees, interns, trainees and employees on contract at its workplace or on client sites.
Approved By	This Policy is approved by the Management of Paragon.
Review History	This Policy is to be reviewed annually. It may be amended from time to time at the discretion of the Management.

THE POLICY	
Definitions	
Aggrieved	For the purpose of This Policy, Aggrieved means: <ul style="list-style-type: none"> • In relation to Workplace, a person whether currently employed or not, who alleges to have been subject to any act of Sexual Harassment.
Employee	For the purpose of This Policy, Employee means: <ul style="list-style-type: none"> • A person employed at a Workplace for any business activity; on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name.
Employer	For the purpose of This Policy, Employer means: <ul style="list-style-type: none"> • The Senior Partners at Paragon or any person(s) responsible for the management, supervision and control of the Workplace.
Perpetrator/Respondent	For the purpose of This Policy, Respondent means: <ul style="list-style-type: none"> • Against whom the Aggrieved has filed a complaint.
Sexual Harassment	Sexual Harassment can occur between individuals of the opposite sex or of the same sex. It shall comprise of, but shall not be limited to, following acts of unwelcome sexual behaviour of direct or implied nature such as: <ul style="list-style-type: none"> • physical contact and advances; • demand and/or request for sexual favours; • making sexually coloured remarks;

	<ul style="list-style-type: none"> • showing pornography and/or obscene media; • any other unwelcome physical, verbal or non-verbal conduct of sexual nature. <p>Furthermore, if the following circumstances occur or are present in connection with sexually determined act or behaviour may also amount to sexual harassment:</p> <ul style="list-style-type: none"> • Implied or explicit promise of preferential treatment in his/her employment; • Implied or explicit threat of detrimental treatment in his/her employment; • Implied or explicit threat about his/her present or future employment status; • Interference with his/her work or creating an intimidating or hostile work environment for him/her; • Humiliating treatment likely to affect his/her health and/or safety.
Unwelcome Sexually Determined Behaviour	<p>Unwelcome sexually determined behaviour, direct or implied, includes but is not limited to:</p> <ul style="list-style-type: none"> • Subjecting another person to an unwelcome act of physical contact including touching, brushing, grabbing, including sexual flirtations, advances or propositions; • Making any unwelcome remark with direct or implied sexual connotations like sexually explicit remarks, cracking vulgar jokes, using sentences with sexual connotations or making sexist remarks, etc.; • Showing any sexually explicit visual material in the form of pictures, cartoons, pin-ups, media, screen savers on computers or any offensive written or electronic material; • Engaging in any other unwelcome conduct of a sexual nature, verbal or nonverbal; • Sending unwelcome communication of sexual nature, through e-mail, letter, mobile technology or any other form of oral, written or electronic communication, exhibiting conduct of a sexual nature.
Workplace	<p>For the purpose of This Policy, Workplace includes:</p> <ul style="list-style-type: none"> • All the offices or other premises where Paragon's business is conducted. • All the outside premises where Paragon's business activities are conducted. • All the transportation undertaken for business activities. <p>All social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.</p>
Internal Complaints Committee (ICC)	
Paragon has an appropriate complaint mechanism in the form of Internal Complaints Committee (ICC) for a time-bound and correct redressal of a complaint raised by the victim.	
Paragon's ICC constitute of following:	

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- Presiding Officer – Ms. Hemangi Panchal
Poorva can be reached on +91-9870889755 or at hemangi@paragonpartners.in
- Employee Representative – Mr. Niten Lalpuria
Niten can be reached on +91-9167344151 or at niten@paragonpartners.in
- External Member – Mrs. Suneera Nindrajog
Suneera can be reached on +91-9890966286 or at suneera@nomosassociates.com

Additional members to the ICC shall be added as may be required, from time to time.

Responsibilities allocated to the ICC are:

- Investigating every formal, oral or written, complaint of Sexual Harassment, either by the Aggrieved or that is made by the third parties or anonymously raised.
- Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment
- Discouraging and preventing employment-related Sexual Harassment.

Grievance Redressal (Annexure 1)

Refer Annexure 1 for Grievance Redressal chart

Informal Grievance Redressal

- Often, some behaviour is not intentional. While this does not make it acceptable, the Aggrieved should explicitly stop the unwelcome behaviour so the person behaving inappropriately justly gets the opportunity to modify or stop their offensive conduct.
- Informal processes serve as a colloquial interim measure for resolving the issue.
- In the case of the first instance of Sexual Harassment, the Aggrieved may choose to contact any other employee, seeking informal support and/or intervention to stop the unwelcome behaviour by the Perpetrator.
- Such employee may convey to the Perpetrator about the distressful effect of the person's actions, words or behaviour and convey in no uncertain terms that such behaviour is not appreciated.
- In the event of the complaint not being resolved through the informal mechanism, or if the Aggrieved is not comfortable addressing the Perpetrator directly, then it shall be formally escalated to the ICC for redressal.

Formal Grievance Redressal:

- The Aggrieved shall make a written complaint of Sexual Harassment at the Workplace to ICC, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of the last incident.
- Once a complaint is received, the ICC shall share the same with the alleged Perpetrator and the Respondent shall be given an opportunity to prepare and submit a response to the complaint within a stated time.
- The ICC may, during the course of inquiry, obtain and review statements and testimonies from any witnesses and third parties.
- The ICC may, at the request of the Aggrieved, take steps to settle the matter between the Aggrieved and the Respondent through conciliation. Monetary settlement cannot be the basis of conciliation.

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- Once the settlement is arrived at, the ICC shall record the settlement arrived at and forward the same to the Employer to take action as specified in the recommendation. The ICC shall provide the copies of the settlement to the Aggrieved and the Respondent.
- However, if the Aggrieved informs the ICC that any term or condition of the settlement arrived at has not been complied with by the Respondent, the ICC shall proceed to make an inquiry into the complaint or forward the complaint to the police.
- In a scenario when no conciliatory settlement is achieved, the ICC shall proceed with the completion of the inquiry. It shall then provide a report of its findings to the Employer within a period of 10 days from the date of the completion of the inquiry and such reports can be made available to the concerned parties.
- Where both the parties are Employees, the parties shall during the course of inquiry be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- During the pendency of inquiry, the ICC may recommend to the Employer such relief to the Aggrieved as it may consider appropriate and in line with all the applicable statutory laws. The Employer shall implement such recommendations and send a report of such implementation to the ICC.
- Where the allegation of the respondent is proved by ICC, it shall recommend the Employer to grant such relief to the Aggrieved which shall be in line with the applicable statutory laws.
- Where ICC comes to a conclusion that the allegation against the Respondent is not proved, it shall recommend to the Employer that no action shall be taken in the matter. The Employer shall act upon the recommendation within 60 days of the receipt of the recommendation.

Addressing bottle necks faced while formulating Formal Grievance Redressal:

- Extension of complaint period:
 - If the ICC finds that the circumstances were such which prevented the Aggrieved from filing a complaint within the said period, then the ICC shall extend the time limit.
 - However, the extension cannot exceed a further period of three months, or as deemed fit by the ICC, on case-to-case basis. The reasons for extension of time limit has to be recorded in writing.
 - Provided where such complaint cannot be made in writing, the ICC shall render all reasonable assistance to the Aggrieved for filing the written complaint.
- Incapacity of the Aggrieved:
 - Physical incapacity - Where the Aggrieved is unable to make a written complaint on account of his/her physical incapacity, a complaint may be filed by Aggrieved person's relative or friend; Co-worker; 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.
 - Mental incapacity - Where the Aggrieved is unable to make a written complaint on account of his/her mental incapacity, a complaint may be filed by the Aggrieved person's relative or friend; a special educator; a qualified psychiatrist; or the guardian or authority under whose care he/she is receiving treatment or care; or any person who has knowledge of the incident jointly with the Aggrieved's relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care the Aggrieved is receiving treatment or care.
 - Other incapacity - Where the Aggrieved for any other reasons is unable to make a written complaint, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved's written consent.

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- Death - Where the Aggrieved is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved's legal heir.

Record Keeping

ICC shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented and copy of full report of ICC will be kept with the Presiding officer.

Confidentiality

The identity and addresses of the Aggrieved Woman / Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by Paragon under the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner whatsoever. All Employees and witnesses who are part of the ICC proceedings will need to sign confidentiality agreements. Any person found to be in breach of the confidentiality obligations provided herein and / or under the Act, as the case may be, shall be liable for the consequences of such breach as prescribed under the confidentiality agreements or as per applicable law. In addition, under the Act, the Presiding officer on behalf of Paragon shall be entitled to recover Rs 5,000 as penalty from any person who breaches the obligation of confidentiality.

Information may be disseminated regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved Woman / Complainant and witnesses.

Appeal

In the event that any person is aggrieved from the recommendations made by the ICC or non-implementation of such recommendations, she may appeal to the appropriate authority, as specified by the Act, within a period of 90 (ninety) days of the recommendations.

Non Retaliation

While dealing with complaints of Sexual Harassment, the ICC shall ensure that the Aggrieved Woman / Complainant or the witness(es) are not victimized or discriminated against by the Respondent or by others at the behest of the Respondent.

Further, Paragon does not tolerate retaliation in any form or manner against any Employee who, acting in good faith, reports suspected misconduct or raises concerns.

Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action as per the terms of employment.

Punitive Measures

Malicious Complaints

If ICC arrives at a conclusion that:

- the allegation against the Respondent is malicious or;
- the Aggrieved or any other person making the complaint has made a complaint knowing it to be false or;

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- the Aggrieved or any other person making the complaint has produced any forged or misleading document;

then, the ICC shall recommend to the Employer to take necessary action as prescribed under statutory laws against the complainant or the person who has made the complaint.

However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. A malicious intent on part of the complainant can be established only after conducting a further inquiry into the complaint.

Malicious Witness –

If ICC arrives at a conclusion that during the inquiry that any witness had given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness, to take action as may be prescribed in the provisions of the statutory laws.

Convicted Respondent -

Where ICC arrives at a conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer to take any of the following actions:

- Written apology
- Warning
- Reprimand or censure
- Withholding of promotion
- Withholding of pay rise or increments
- Terminating the respondent from service
- Undergoing a counselling session.

The Employer can also take actions other than the abovementioned, if it deems fit.

Notes

The contents of the complaint made, the identity and addresses of the Aggrieved, the Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of ICC and the action taken by the Employer shall not be published, communicated or made known to the public, press or media in any manner.

Any person who violates the above shall be penalised by the Employer with such amount as may be prescribed in the applicable statutory rules.

However, justice secured to any victim of Sexual Harassment can be disseminated without disclosing the details mentioned above.

This Policy is adopted on the lines of the Government notified rules under the POSH Act titled the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("POSH Rules")

In case of any conflict between the provisions of this Policy and the Act, the provisions of the Act shall prevail. However, if the Policy provides for a behavioural standard higher than that envisaged under the Act, then the Employees of the Company shall adhere to such higher behavioural standards as part of their terms of employment.

Annexure 1

Version Number	Version Date
1.0	May 2017
2.0	February 2018
3.0	November 2018
4.0	December 2019
5.0	December 2020
6.0	December 2021
7.0	December 2022
8.0	December 2023
9.0	December 2024
10.0	December 2025