

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

Introduction

ASQI is committed to maintaining a professional and collegial work environment in which all individuals are treated with respect and dignity. ASQI will not tolerate conduct by any employee that harasses, disrupts, or interferes with another's work performance or which creates an intimidating, offensive or hostile work environment. Accordingly, no form of harassment or inappropriate conduct will be tolerated against employees by other employees or by vendors, contractors or any other individuals who conduct business with the Company.

Sexual Harassment and Other Forms of Discriminatory Harassment Prohibited

Illegal and prohibited harassment includes sexual harassment and harassment based on actual or perceived age, race, color, religion, creed, sex, gender, national origin, citizenship, disability, genetic information, marital status, familial status, sexual orientation, gender identity, partnership status, uniformed military service, status as a victim of domestic violence, engaging in protected activity (i.e., opposition to prohibited discrimination or participation in proceedings covered by the anti-discrimination statutes) or any other characteristic protected by applicable law. These forms of harassment protected by applicable law exist when:

- The conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance; or
- The conduct otherwise adversely affects an individual's employment opportunities.

Inappropriate Behavior and Harassment

"Sexual harassment" is a subset of other forms of harassment, and includes many forms of offensive behavior. It can be direct or indirect. Sexual harassment has been defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to the conduct is either an explicit term or condition of employment or continuing employment;
- Submission to or rejection of the conduct is used as a basis for employment decisions affecting the person who did the submitting or rejecting; or
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment often falls into one of these categories, but other forms also exist:

- 1) **Verbal:** sexual innuendo, suggestive comments, jokes about gender-specific traits, questions about a person's sexual practices, comments about a person's body, or slurs.
- 2) **Physical:** unwelcome touching, brushing against the body, patting, impeding or blocking movement, as well as assault, sexual battery, rape or attempted rape.
- 3) **Visual display:** posting or presentation of sexual photographs, obscene letters or invitations, demeaning cartoons, unwanted love letters or emails, leering, staring, or stereotyping, and viewing, displaying or circulating discriminatory or sexually explicit or suggestive materials.

The use of information systems (including email or the internet) for the display or transmission of sexually explicit images, messages, off-color jokes or anything that may be construed as harassment or showing disrespect for others, is prohibited.

Consensual Relationships

Employees should be aware there is a risk to entering into a sexual or romantic relationship with another employee or person connected to ASQI, since office-based relationships can go awry and lead to conflicts in the workplace. ASQI has the right to protect its interests and take appropriate action to avoid or address potential problems in this area.

While ASQI does not categorically prohibit employees from entering into consensual relationships, certain relationships could be deemed to be inappropriate and may be grounds for termination, particularly when there is a reporting relationship. If possible, discuss a developing relationship with a manager or the HRD in order to create a record that both parties involved view it as consensual.

Reporting Violations of this Policy

Any employee who believes that he or she has been subjected to conduct that violates this policy, or who has information about any potential violation of this policy, should immediately and directly notify the HRD.

Further, an employee who is in a supervisory or managerial role has an obligation to immediately contact the HRDD if he or she is aware of or receives a complaint or any information regarding conduct prohibited by this policy, even if the activity occurred outside of his or her department. While confidentiality will be protected to the extent possible, there is no such thing as an "off the record" discussion where harassment is concerned. Corrective action, up to and including termination of employment, will be taken if an employee in a supervisory or managerial role knew of prohibited conduct and failed to properly report it or did not take appropriate measures to control behaviors within his or her work environment.

IF YOU ARE HARASSED – other steps to take

- If comfortable doing so, promptly and clearly confront the individual you feel is harassing you and tell them that the behavior was unwelcome and will not be tolerated. If you are not comfortable doing so, there is no requirement to confront the individual you feel is harassing you. Legally, the person does not have to confront the alleged harasser in order to report sexual harassment.
- If the problem continues after you have advised an individual that his or her behavior is offensive to you, or if you feel direct confrontation is inappropriate or makes you feel uncomfortable, report the situation immediately to your manager and/or the HRDD.
- Don't feel guilty. You are entitled to work in a workplace free of harassment, and you should fully assert that right.

IF HARASSMENT IS REPORTED TO YOU OR OBSERVED BY YOU AS A SUPERVISOR

- Take all reports of harassment seriously. Demonstrate that you care and are concerned. Be supportive and sensitive.
- State your commitment to the anti-harassment policy and inform the reporting individual that no retaliation will occur.
- Tell the employee that you must follow the reporting procedure and contact the HRDD. Do not conduct a further investigation on your own.
- Maintain confidentiality to the fullest extent possible, and protect the rights of both the accuser and the accused.

Investigatory Process

Every effort will be made to conduct a prompt and thorough investigation of any complaint of harassment. Each complaining party, the alleged wrongdoer and any other persons with knowledge of the situation have an obligation to cooperate fully with any investigation, including by providing all relevant information to the investigator. Employees who refuse to cooperate in an investigation may be subject to corrective action up to and including immediate termination of employment. All complaints and investigations will be handled with sensitivity. Managers should not attempt to handle investigations on their own. Confidentiality will be maintained to the extent possible, consistent with a thorough investigation.

ASQI's policies are equally enforceable at all personnel levels and at each Company office. Violation of the firm's policy regarding harassment will lead to disciplinary action that can include termination. Depending on the facts of a given situation, disciplinary action may also include, but is not limited to, the following: a verbal warning, suspension without pay, a written warning, reassignment, training and/or mandatory referral to a counseling professional, postponed salary increase or promotion based on a review of the situation. ASQI reserves the right to report extreme cases of harassment to appropriate law enforcement authorities.

Protection Against Retaliation

ASQI policy forbids retaliation against any individual who opposes unlawful harassment, files a complaint, testifies, assists, or participates in any manner in an investigation, proceeding, or hearing. There is no time limitation on this protection. Retaliation complaints should be reported immediately to the HRDD. Individuals found to have engaged in retaliation will be subject to corrective action, up to and including immediate termination of employment.

Because of the seriousness of our commitment to prevent workplace harassment, ASQI undertakes investigations of all accusations of unlawful harassment in an effort to determine the facts. No accusation is considered frivolous, but guilt of the accused party is not presumed and rights of a falsely accused individual will be protected, as well as the rights of one who has been subjected to harassment.

Annexure – A

Internal Complaints Committee at ASQI Investment Managers Pvt Ltd	
Presiding Officer	Ms. Palak Nanjani
Member	Ms. Sonia Kapoor
Member	Mr. Shitij Singh
Member	Mr. Atharva Utekar
External Member	Mr. Anand Ved
Employer	Mr. Swapnil Pawar

For ASQI Investment Managers Pvt Ltd



Authorized Signatory

