

**TURTLEMINT FINTECH SOLUTIONS LIMITED
ANTI SEXUAL HARASSMENT POLICY**

INTRODUCTION

Turtlemint Fintech Solutions Ltd is committed to lawful and ethical conduct of business. Honesty, compassion, veracity, reverence for its employees are entrenched as core principles and values of Turtlemint Fintech Solutions Ltd

Turtlemint Fintech Solutions Ltd is an equal employment opportunity provider. The Company does not discriminate its employees on the grounds of gender, promotes a work environment that encourages mutual respect, courteous and congenial relationships. We believe in providing a non-hostile safe working environment without fear of prejudice, gender bias and sexual harassment to all its employees.

All employees of the Company have the right to be treated with dignity and every employee has the right to be protected against harassment.

Turtlemint Fintech Solutions Ltd holds the responsibility to identify and prevent sexual harassment and to develop a culture of dignity and respect in the day-to-day conduct of its business. We will respond promptly to reports of sexual harassment and will take appropriate steps to discipline behavior that violates this and, if necessary, facilitate legal action.

This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means we adopt to prevent occurrence of any such event, and in the event of such an occurrence, to enable a fair mechanism for dealing with such conduct.

SCOPE

This policy is applicable to employees, workers, probationer and trainees, contractual or otherwise (whether in the office premises or outside while on assignment). This policy shall be considered a part of the employment contract or terms of engagement of the persons in the above categories. Where the alleged incident occurs to our employee by a third party while on a duty outside our premises, we would perform all reasonable and necessary steps to support our employee.

“Sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- I. Physical contact and advances or
- II. A demand or request for sexual favors or
- III. Making sexually colored remarks or
- IV. Showing pornography or
- V. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

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.

WORKPLACE INCLUDES:

- i. All offices or other premises where the Company's business is conducted
- ii. All company-related activities performed at any other site away from the Company's premises
- iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace.
- iv. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey

COMPLAINT REDRESSAL COMMITTEE

Turtlemint Fintech Solutions Ltd's Internal Committee (IC) shall consider and redress complaints of Sexual Harassment. The composition of the IC is based on the recommendations by Ministry of Law and Justice mentioned in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

An IC, as the name suggests, is an internal committee of a workplace to receive and redress complaints of sexual harassment. It is required to consist of a minimum of four members:

1. A Presiding Officer who has to be a woman employed at a senior level at workplace. She has to be from amongst the employees.
2. Two Members from amongst employees. The law says that for these two members, employers should prefer to have employees who are committed to the cause of women or who have had experience in social work or have legal knowledge.
3. One Member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment ("**External Member**").

The law also states that at least half of the total Members of the IC should be women.

TURTLEMINT FINTECH SOLUTIONS LTD's POSH committee members are as follows:

A quorum of 4 members is required to be present for the proceedings to take place.

Contact details of the IC Committee members are available in Appendix 'A'.

To contact the Committee, you can write to Group Email Id mentioned below each Committee.

Branch	Sr. No.	Name	Designation	Email ID
Mumbai Office	1	Chaitali Gala	Presiding Officer	chaitali.g@turtlemint.com
	2	Deepali Ingle	External Member	deepali@mindshieldconsultancy.com
	3	Arbaz Shaikh	Member	arbaz.s@turtlemint.com
	4	Priyanka Singh	Member	priyanka.s@turtlemint.com
	5	Amruta Palav	Member	amruta.p@turtlemint.com

Group Email Id - reachicmumbai@turtlemint.com

Branch	Sr. No.	Name	Designation	Email ID
Pune Office	1	Chaitali Gala	Presiding Officer	chaitali.g@turtlemint.com
	2	Deepali Ingle	External Member	deepali@mindshieldconsultancy.com
	3	Dipti Godse	Member	deepti.g@turtlemint.com
	4	Snehil Modani	Member	snehil.m@turtlemint.com

Group Email Id - reachicpune@turtlemint.com

Branch	Sr. No.	Name	Designation	Email ID
Goa Office	1	Chaitali Gala	Presiding Officer	chaitali.g@turtlemint.com
	2	Deepali Ingle	External Member	deepali@mindshieldconsultancy.com
	3	Valzera Rodrigues	Member	valzera.rodrigues@turtlemint.com
	4	Saeesh Deshpande	Member	saeesh.deshpande@turtlemint.com
	5	Arbaz Shaikh	Member	arbaz.s@turtlemint.com

Group Email Id - reachicgoa@turtlemint.com

Communication to all Employees: Sexual Harassment Policy & its awareness must be communicated to all new employees during Induction/Training and all the existing employees can refer the policy on HRMS.

DUTIES OF THE EMPLOYEE

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

DUTIES OF THE EMPLOYER



The Company will take proactive measures to sensitize its employees about the need for appropriate workplace conduct in a gender neutral manner.

- i) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace
- ii) Display at any conspicuous place in the workplace, the consequences of sexual harassment and the order constituting the IC
- iii) Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and conduct orientation programs for the members of the IC in the manner as may be prescribed
- iv) Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry
- v) Assist in securing the attendance of respondent and witnesses before the IC
- vi) Make available such information to the IC as it may require having regard to the complaint made
- vii) Provide assistance to the employee, if he/she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force
- viii) Cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the Complainant so desires where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.
- ix) Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct
- x) Monitor the timely submission of reports by the IC

REDRESSAL PROCESS

- a. The complainant may make, in writing, a complaint of sexual harassment at workplace to the Committee within a period of 3 months from the date of incident and in case of series of incidents, within a period of 3 months from the date of last incident.
- b. The IC committee will maintain a register to endorse the complaint received and shall keep the contents confidential, if it is so desired and use the same for discreet investigation.
- c. The IC Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- d. At the first meeting, the IC Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, the same shall be done by the Presiding Officer (if the complainant is a lady employee) on behalf of the complainant.
- e. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation. The Committee will conduct an 'Enquiry' and conclude the case based on the findings of the enquiry.
- f. If it is found that the complaint does not fall under the purview of Sexual Harassment Policy, the same would be dropped or redirected to the right forum, after recording the reasons thereof.
- g. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

ENQUIRY PROCESS

- a. After meeting the Complainant, the IC Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- b. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her, an opportunity to submit a written explanation if she/ he so desires within 7 days of receipt of the same.
- c. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- d. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es, who they propose to call.
- e. If the Complainant or the person against whom the complaint is made, desire to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- f. The Committee shall call upon all witnesses mentioned by both the parties and record their statement.
- g. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- h. The Committee shall complete the 'Enquiry' within reasonable period but not beyond 1 month and communicate its findings and its recommendations for action to Human Resource department. The report of the committee shall form the guidelines on which appropriate action can be initiated by HR department, against an employee, if he/she is found guilty of sexual misdemeanor.
- i. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

CONCILIATION

Conciliation is a process of mediation between 2 disputing parties. If the aggrieved person requests conciliation proceedings to settle the matter, then no monetary settlement shall be basis for such settlement / conciliation.

ACTION DURING PENDENCY

- i) During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend the Company to:
 - a) Transfer the Complainant or the respondent to any other workplace; or
 - b) Grant leave to the Complainant up to a period of 3 months; or
- i) The final decision, however, is left solely to the discretion of IC and the Company.
- ii) The leave granted to the Complainant will be in addition to the leave he/she would be otherwise entitled to.

SUPPORT & PREVENTIVE ACTION



Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Turtlemint Fintech Solutions Ltd shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

LEGAL IMPLICATIONS

In case, the IC Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

REPORTING

The IC Committee shall analyze and report on all complaints of this nature at the quarterly Management of Business Ethics review. Findings and recommendations for action will be reported to CEO/ Management.

PROTECTION TO COMPLAINANT/WITNESSES

- i) The Company will ensure that Complainants and witnesses will not be victimised or discriminated because of their complaint.
- ii) Any form of unwarranted pressures, retaliation, victimisation or any other type of unethical behavior by the alleged respondent against the Complainant and / or
- iii) witnesses shall be reported immediately to the IC. In case of genuine complaints, the IC may recommend to the Company, to take appropriate disciplinary action. The Company will ensure that Complainant or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.

PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

- i) If an employee is found to have raised a false complaint, then severe action will be taken against the employee. This may include verbal warning or suspension or termination from services of the Company as recommended by the IC.
- ii) A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.
- iii) The malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.
- iv) In case the IC arrives at a conclusion that during an inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Company to take action in accordance with the provisions of the service rules applicable to the employee. This may include verbal warning or suspension or termination from services of the Company as recommended by the IC.

CONFIDENTIALITY

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act

AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the employees unless the same is notified to the Employees in writing.

Version	Approval / Revision Date	Description	Reviewed by	Approved By
V1	18/10/2016	Initial Version	Chaitali Gala	Anand Prabhudesai
V2	19/01/2017	Revision in Appendix A (Update in Committee Member name)	Chaitali Gala	Anand Prabhudesai
V3	20/06/2018	Revision in Appendix A (Update in Committee Member name)	Chaitali Gala	Anand Prabhudesai
V4	18/07/2019	Revision in Appendix A (Update of External Committee Member name)	Chaitali Gala	Anand Prabhudesai
V5	20/07/2020	Revision in Appendix A (Update in Committee Member name)	Chaitali Gala	Anand Prabhudesai
V6	01/08/2020	Revision in Appendix A (Addition in Committee List)	Chaitali Gala	Anand Prabhudesai
V7	07/10/2020	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V8	30/12/2020	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V9	02/02/2021	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V10	24/04/2022	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V11	01/09/2022	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai

V12	01/05/2023	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V13	01/02/2024	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V14	01/04/2024	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai
V15	23/06/2025	Revision in Appendix A (Update in Committee List)	Chaitali Gala	Anand Prabhudesai