



PDR ORGANIZATION PRIVATE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Version: 1.0

Effective Date: 01-09-2026

Policy Owner: Human Resources / Internal Committee

Approved By: Board of Directors / Management

Review Frequency: At least annually or as required by law

1. PURPOSE

PDR Organization Private Limited ("PDR" or the "Company") is committed to providing a safe, respectful, inclusive and professional working environment. PDR has zero tolerance towards sexual harassment and is committed to prevention, prohibition and redressal in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), applicable rules and other applicable laws.

2. SCOPE

This Policy applies to permanent, probationary, temporary, part-time and contractual employees, trainees, interns, apprentices, consultants and other persons working with or for PDR, as applicable. It also covers work-related interactions with clients, arbitrators, conciliators, vendors, service providers and visitors. The statutory complaint mechanism applies to an "aggrieved woman" as defined under the POSH Act. PDR nevertheless expects all persons to maintain professional and respectful conduct.

3. APPLICABLE LAW

This Policy shall be read with the POSH Act, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, and other applicable laws. If this Policy conflicts with a mandatory legal requirement, applicable law shall prevail.

4. DEFINITIONS

Aggrieved Woman, Employee, Internal Committee (IC), Respondent and Sexual Harassment shall have the meanings assigned under the POSH Act. Sexual harassment includes unwelcome physical, verbal or non-verbal conduct of a sexual nature, including physical contact and advances, demand or request for sexual favours, sexually coloured remarks, showing pornography, and other conduct covered by the Act. Relevant circumstances include employment-related promises or threats, interference with work, hostile work environment and humiliating treatment affecting health or safety.

5. WORKPLACE

Workplace shall be interpreted in accordance with the POSH Act and includes PDR offices and other locations covered by law, including client premises, business travel, training programmes, work-related events and transportation connected with employment. For PDR's ODR operations, it also covers online hearings, video conferences, official email, WhatsApp/business communication, work-related messaging groups and other digital environments used for PDR work.

6. ZERO-TOLERANCE PRINCIPLE

No person covered by this Policy shall engage in, encourage or facilitate sexual harassment; retaliate against a complainant, witness or participant; knowingly make a false complaint or provide false evidence; interfere with an IC inquiry; destroy or manipulate evidence; or breach applicable confidentiality obligations.

7. PREVENTION

PDR shall communicate this Policy, display required information, conduct awareness programmes, provide orientation to IC members, maintain complaint channels, inform employees of the IC and complaint process, and periodically review workplace risks and practices.

8. INTERNAL COMMITTEE

Where required by the POSH Act, PDR shall constitute an Internal Committee by written order. The IC shall comply with statutory composition requirements: a senior-level woman as Presiding Officer; at least two employee members meeting

statutory eligibility; and one external member from an eligible NGO/association or person familiar with issues relating to sexual harassment. At least one-half of the total members shall be women. Tenure shall be as prescribed by law.

9. IC DETAILS

The current IC shall be notified separately through a formal management order. Its names and contact details shall be communicated to employees and displayed or otherwise made prominently available as required by law.

10. COMPLAINT MECHANISM

An aggrieved woman may make a complaint to the IC in accordance with the POSH Act. The complaint should ordinarily be made in writing and within the statutory period prescribed by law. Where she is unable to make it in writing, the IC shall provide reasonable assistance. Complaint Email: posh@pdr-court.com . Physical Submission: PDR Office / HR / IC.

11. THIRD-PARTY COMPLAINTS

Where the alleged perpetrator is not a PDR employee, the IC and PDR shall address the matter in accordance with applicable laws. PDR shall, where applicable and legally permissible, assist the aggrieved woman, take all necessary steps within its control, cooperate with competent authorities, and take appropriate action against any outsider where warranted.

12. GENDER NEUTRAL POLICY

While the statutory Prevention of Sexual Harassment (POSH) Act, 2013, governs complaints filed by women, PDR is firmly committed to maintaining a safe, inclusive, and respectful workplace for all employees regardless of gender identity or sexual orientation. Recognizing that sexual harassment is not gender-specific, male employees, members of the LGBTQIA+ community, and individuals of any other gender identity who experience unwelcome sexually determined behavior may approach the Grievance Redressal Committee (or the designated internal committee).

All such complaints will be received, processed, investigated, and redressed with the same standard of strict confidentiality, impartiality, promptness, and protection against retaliation as mandated under the organization's zero-tolerance policy.

13. CONCILIATION

At the request of the aggrieved woman, and before commencing an inquiry, the IC may attempt conciliation in accordance with the POSH Act. Monetary settlement shall not be made the basis of conciliation. Any settlement and subsequent action shall comply with applicable law.

14. INQUIRY PROCESS

Where conciliation is not requested, is unsuccessful, or otherwise does not resolve the matter in accordance with law, the IC shall conduct an inquiry in accordance with the POSH Act and applicable rules. The inquiry shall be fair and impartial, and parties shall be given reasonable opportunity to present their positions and evidence, subject to law.

15. DIGITAL EVIDENCE

Relevant electronic evidence may include emails, WhatsApp messages, SMS, call-related records, video-conference records, meeting invitations, screenshots, photographs, documents, access logs and system logs. Such evidence shall be handled securely and confidentially. No person shall intentionally delete, alter, conceal or manipulate evidence.

16. INTERIM RELIEF

During an inquiry, the aggrieved woman may request interim relief as permitted by the POSH Act. Subject to law and circumstances, the IC may recommend transfer, leave as permitted by law, modification of reporting arrangements, restriction of direct interaction, change in work allocation or other appropriate measures. Such measures shall not constitute a finding of guilt.

17. RIGHTS OF RESPONDENT

PDR recognises the need for a fair process. The respondent shall be given an appropriate opportunity, in accordance with law, to receive the allegations, submit a response, present relevant evidence, identify witnesses and participate in the inquiry. A complaint shall not by itself be treated as proof of guilt.

18. CONFIDENTIALITY

PDR shall maintain confidentiality regarding the identity of the aggrieved woman, respondent, complaint, evidence, proceedings, recommendations and action taken, except to the extent disclosure is permitted or required by law. Information shall be shared only with persons having a legitimate need to know.

19. NON-RETALIATION

PDR strictly prohibits retaliation against a person who makes a complaint in good faith, participates in an inquiry, provides evidence, acts as a witness or assists the IC. Retaliation includes threats, intimidation, adverse employment action, harassment, discrimination, exclusion or other retaliatory conduct.

20. FALSE OR MALICIOUS COMPLAINTS

False or malicious accusations of Sexual Harassment can have serious or devastating effect on innocent Employees. A complaint that cannot be substantiated is not, by itself, evidence that it was false or malicious. Action shall be considered only where the IC, following appropriate inquiry and in accordance with law, concludes that a complaint or evidence was knowingly false, malicious or supported by forged or misleading documents. No person shall be penalised merely because a complaint was not proved.

21. DISCIPLINARY ACTION

Where sexual harassment is established, IC shall recommend disciplinary action against the Respondent, if found guilty, post completion of the investigation proceedings. The nature and severity of the disciplinary action will be commensurate with the severity and persistence of misconduct.

PDR shall take appropriate action in accordance with the POSH Act, applicable service rules and employment policies. Depending on circumstances and law, the disciplinary action may include Warning, Reprimand, Counselling, Written Apology, Withholding of Promotion or Increment, Demotion, Transfer, Suspension, Termination or other lawful disciplinary action. Criminal conduct may be reported or otherwise dealt with in accordance with law.

22. IMPLEMENTATION OF DISCIPLINARY ACTION

The disciplinary action recommended by the IC must be disclosed to the Respondent and the Complainant/Aggrieved Person, separately.

- The disciplinary action to be taken shall be informed to the parties in writing by the Human Resource Officer or the nominated disciplinary authority, as the case may be within a reasonable time.

- Failure or refusal of any person to co-operate with the Committee, disturb the proceedings of the Committee, misguide the Committee by giving false testimony or suppression of fact during the investigation shall attract disciplinary action as deemed appropriate.
- All inquiries for complaint of Sexual Harassment must be completed within 90 days of commencement of inquiry or as per existing legal provision of the country under question, whichever is less.

23. STATUTORY AUTHORITIES

Nothing in this Policy prevents an aggrieved woman from approaching law enforcement or other competent authorities where permitted by law. PDR shall provide appropriate assistance and cooperation as required.

24. ANNUAL REPORTING

The IC shall prepare and submit its annual report in accordance with the POSH Act and applicable rules, including prescribed information such as complaints received, complaints disposed of, complaints pending and awareness programmes conducted. PDR shall comply with applicable statutory reporting requirements.

25. AWARENESS AND TRAINING

PDR shall conduct periodic awareness programmes for employees regarding prohibited conduct, complaint mechanisms, confidentiality, non-retaliation, employee responsibilities and the role of the IC. IC members shall receive appropriate orientation/training. PDR shall maintain training records.

26. EMPLOYEE RESPONSIBILITIES

Employees shall maintain professional conduct; respect colleagues and other persons; avoid unwelcome sexual conduct; cooperate with legitimate IC proceedings; maintain confidentiality; refrain from retaliation; preserve relevant evidence; and use appropriate reporting channels.

27. MANAGEMENT RESPONSIBILITIES

Management shall maintain a safe working environment, implement this Policy, constitute the IC where required, provide reasonable facilities to the IC, support awareness and training, facilitate inquiries, implement lawful recommendations, maintain records, ensure confidentiality and periodically review compliance.

28. IC RESPONSIBILITIES

The IC shall perform its statutory functions, including receiving complaints, examining complaints, conducting inquiries, following principles of natural justice, maintaining confidentiality, recommending appropriate action and interim measures where applicable, maintaining records and preparing statutory reports.

29. CONFLICT OF INTEREST

An IC member shall disclose any actual or potential conflict of interest. Where a conflict may affect impartiality, PDR shall take appropriate steps in accordance with applicable law, including recusal or replacement where appropriate.

30. RECORD MANAGEMENT

PDR shall securely maintain records relating to IC constitution, complaints, notices, responses, evidence, inquiry proceedings, recommendations, action taken, training, awareness programmes and statutory reports. Access shall be restricted to authorised persons.

31. PERSONAL INFORMATION

POSH-related information shall be treated as confidential and protected through appropriate organisational and technical controls. Employees shall not copy, forward, upload or circulate POSH-related information through unauthorised channels.

32. ONLINE AND REMOTE WORKING

This Policy applies to virtual meetings, online hearings, work-related video conferences, official messaging groups, work-related calls, electronic communications, remote working and other digital interactions connected with employment or PDR's business.

33. EXTERNAL INTERACTIONS

PDR employees interact with banks, NBFCs, clients, borrowers/respondents, claimants, advocates, arbitrators, conciliators, vendors and other stakeholders. All interactions must remain professional. Where inappropriate conduct by an external person is reported, PDR shall take appropriate steps within its legal and practical authority.

34. COMMUNICATION

PDR shall make this Policy reasonably accessible through HRMS, email, employee handbook, intranet or other appropriate channels and shall communicate IC details and the complaint mechanism.

35. NON-COMPLIANCE

Failure to comply with this Policy may result in disciplinary or other appropriate action, subject to applicable law. PDR shall take appropriate steps where statutory non-compliance is identified.

36. POLICY REVIEW

This Policy shall be reviewed at least annually, upon amendment of applicable law, following material organisational changes, following material POSH-related incidents, or whenever Management considers a review necessary.

37. APPROVAL AND VERSION CONTROL

Company: PDR Organization Private Limited

Policy: POSH Policy

Version: 1.0

Effective Date: 01-09-2026

Policy Owner: HR / Internal Committee

Approved By: Mahadev Gitte

APPENDIX A – INTERNAL COMMITTEE APPOINTMENT ORDER

PDR ORGANIZATION PRIVATE LIMITED
ORDER FOR CONSTITUTION OF INTERNAL COMMITTEE

Date:

Pursuant to the POSH Act, PDR hereby constitutes its Internal Committee with effect from 01-09-2026.

Position	Name	Designation / Details
Presiding Officer	Shubhangi Karad	HR Head
Member	Shama Khan	Advocate
Member	Sivasakthi Nadar	Manager
Member	Sudhanshu Gupta	Sr. Public & Corporate Relations Manager
External Member	Shraddha Kshirsagar	Advocate/ Founder Safe Space India

For PDR Organization Private Limited



Authorized Signatory
Name: Mahadev Gitte
Designation: Director