



SOBHAGYA

CAPITAL OPTIONS PVT. LTD.

(Formerly Known as Sobhagya Capital Options Ltd.)

A SEBI Registered Merchant Banking Company

CORPORATE OFFICE

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Sobhagya Capital Options Private Limited (SCOPL)

Prevention of Sexual Harassment (POSH) Policy

Version: 1.0

Effective Date: 17.07.2026

Approved By: Board of Directors

Review Frequency: Annual or as required by applicable law

1. Purpose

Sobhagya Capital Options Private Limited ("SCOPL" or "the Company") is committed to providing a safe, secure, respectful and inclusive workplace free from sexual harassment, discrimination and intimidation.

The Company has zero tolerance for sexual harassment and is committed to ensuring that every employee is treated with dignity and respect.

This Policy is framed in accordance with:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;
- Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013;
- Applicable provisions of the Companies Act, 2013;
- Applicable SEBI regulations and corporate governance standards.

2. Scope

This Policy applies to:

- Permanent employees;
- Probationers;
- Temporary employees;
- Trainees;
- Interns (paid or unpaid);
- Consultants;
- Retainers;
- Contract employees;
- Apprentices;
- Directors;



- Independent Directors;
- Vendors and service providers while working with the Company;
- Any woman visiting or interacting with the Company in connection with its business.

The policy applies irrespective of gender identity for promoting a respectful workplace. However, complaints under the POSH Act shall be processed in accordance with the provisions of the Act.

3. Workplace

"Workplace" includes but is not limited to:

- Registered office
 - Branch offices
 - Client premises
 - Business meetings
 - Conferences
 - Training programmes
 - Business travel
 - Hotels during official travel
 - Company-sponsored events
 - Virtual workplaces
 - Work-from-home locations
 - Video conferencing platforms
 - Email
 - Telephone communications
 - Instant messaging applications
 - Social media interactions connected with work
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4. Definition of Sexual Harassment

Sexual harassment includes one or more of the following unwelcome acts or behaviour, whether directly or by implication:

- Physical contact and advances;
- Demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography or sexually explicit material;
- Sending inappropriate emails, messages, memes or images;
- Sexually suggestive jokes;



- Repeated requests for dates despite refusal;
 - Staring, leering or intrusive behaviour;
 - Unwelcome touching;
 - Display of offensive material;
 - Verbal abuse of sexual nature;
 - Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
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5. Circumstances Amounting to Sexual Harassment

The following circumstances may also amount to sexual harassment:

- Promise of preferential treatment in employment;
 - Threat of adverse employment consequences;
 - Interference with work performance;
 - Creation of an intimidating or hostile work environment;
 - Humiliation likely to affect health or safety;
 - Retaliation for refusing sexual advances.
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6. Rights of Employees

Every employee has the right to:

- Work with dignity;
 - Equal opportunity;
 - A workplace free from harassment;
 - Confidential complaint handling;
 - Fair investigation;
 - Protection from retaliation.
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7. Responsibilities of Employees

Employees shall:

- Treat colleagues respectfully.
- Maintain professional conduct.
- Avoid behaviour that may constitute harassment.
- Cooperate during inquiries.
- Maintain confidentiality.
- Report incidents promptly.



8. Employer's Responsibilities

SCOPL shall:

- Provide a safe workplace.
 - Display notices regarding POSH.
 - Organize awareness programmes.
 - Conduct periodic sensitization sessions.
 - Ensure timely inquiry.
 - Maintain confidentiality.
 - Implement recommendations.
 - File statutory reports wherever applicable.
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9. Complaint Procedure

Any aggrieved woman may submit a written complaint to the board of directors within three months from the date of the incident.

Where there are multiple incidents, the complaint shall be filed within three months from the last incident.

The board of directors may extend the limitation period by another three months if sufficient reasons are recorded in writing.

Where the complainant is unable to submit the complaint in writing, the board of directors shall provide necessary assistance.

11. Conciliation

Before initiating an inquiry, the complainant may request conciliation.

No monetary settlement shall be the basis of conciliation.

12. Inquiry Process

The board of directors shall:

- Issue notice to the respondent.
- Provide opportunity to both parties.
- Follow principles of natural justice.
- Complete inquiry within ninety (90) days.
- Submit its report within ten (10) days after completion.
- Recommend appropriate action.



13. Interim Relief

During inquiry, the board of directors may recommend:

- Transfer of either party;
- Leave up to three months to the complainant;
- Restriction on interaction;
- Any other appropriate interim measure.

14. Action upon Completion of Inquiry

If allegations are proved, disciplinary action may include:

- Written apology;
- Warning;
- Written reprimand;
- Mandatory counselling;
- Withholding promotion;
- Withholding increment;
- Suspension;
- Termination of employment;
- Deduction from salary as compensation;
- Any other action permissible under applicable service rules.

15. False or Malicious Complaints

If the Board of Director concludes that a complaint was malicious or knowingly false, action may be taken in accordance with the POSH Act and applicable service rules.

Mere inability to substantiate a complaint shall not attract action.

16. Confidentiality

The following shall remain confidential:

- Identity of complainant;
- Identity of respondent;
- Witnesses;
- Contents of complaint;
- Inquiry proceedings;



- Recommendations;
- Action taken.

Any unauthorized disclosure may invite disciplinary action.

17. Protection Against Retaliation

No employee shall suffer retaliation for:

- Filing a complaint;
- Participating in inquiry;
- Acting as witness;

Retaliation shall itself constitute misconduct.

18. Record Keeping

The board of director shall maintain records relating to:

- Complaints received;
 - Inquiries conducted;
 - Findings;
 - Recommendations;
 - Action taken;
 - Training conducted.
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19. Annual Report

The board of directors shall prepare an annual report containing:

- Number of complaints received;
- Number disposed of;
- Number pending beyond ninety days;
- Nature of action taken;
- Awareness programmes conducted.

The Company shall include necessary disclosures in its statutory filings wherever required.

20. Awareness and Training

SCOPL shall conduct:

- Induction training for new employees;
- Annual POSH awareness sessions;



- Specialized training for board members;
 - Periodic awareness communications.
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21. Duties of Managers

Managers and supervisors shall:

- Promote respectful behaviour.
 - Address inappropriate conduct promptly.
 - Encourage reporting.
 - Cooperate with the board of Directors.
 - Prevent victimization.
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22. Consequences of Non-Compliance

Violation of this Policy may result in disciplinary action up to and including termination of employment or termination of contractual engagement.

23. Amendment

The Company reserves the right to amend this Policy to comply with changes in applicable laws, regulations or organizational requirements.

24. Contact Details

Employees may submit complaints to:

Board of Directors,
Sobhagya Capital Options Private Limited

Email: delhi@sobhagyacap.com

Phone: 7836066001

Corporate Office Address: C-7 & 7A, Gate No.-1, Hosiery Complex Phase-II Extension, NOIDA-201305

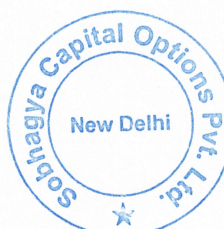
25. Approval

This Policy has been approved by the Board of Directors of Sobhagya Capital Options Private Limited and shall come into force with effect from **17.07.2026**.

Annexure A – Illustrative Examples of Sexual Harassment

Examples include but are not limited to:

- Unwelcome touching or hugging



- Sexual jokes or comments
- Repeated requests for personal meetings after refusal
- Sending sexually explicit emails or WhatsApp messages
- Displaying offensive images
- Staring in a sexually suggestive manner
- Making remarks about appearance with sexual overtones
- Spreading sexual rumours
- Online harassment during virtual meetings
- Offensive comments on social media connected to work

Annexure B – Timelines under the POSH Act

Activity	Timeline
Filing complaint	Within 3 months of incident (extendable by another 3 months for sufficient cause)
Completion of inquiry	Within 90 days
Submission of report	Within 10 days of completion
Employer to act on recommendations	Within 60 days
Appeal	Within 90 days as per applicable law

