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**MONEDO FINANCIAL SERVICES PVT. LTD.**

**Prevention of Sexual Harassment (POSH) Policy**

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## Introduction

Monedo Financial Services Pvt. Ltd. received its first-of-its-kind Digital Lending License from the Reserve Bank of India (RBI) in October 2018. The Company was conceptualized with the vision of driving growth, accessibility, and agility for both consumers and merchant partners through innovative financial solutions.

With a business model designed to empower merchant partners and provide consumers with greater flexibility and choice, Monedo continues to build scalable and responsible lending solutions driven by transparency, fair practices, innovation, and customer-centricity. At Monedo, we are a passionate and agile team committed to responsible lending practices and delivering seamless financial experiences through technology-enabled solutions and ethical business conduct.

## Objective

Monedo Financial Services Pvt. Ltd. is committed to fostering and maintaining a professional, safe, inclusive, and respectful work environment that upholds the dignity, equality, and well-being of every individual associated with the organization. The Company firmly believes that all employees and stakeholders have the right to work in an environment free from sexual harassment, discrimination, intimidation, retaliation, and any form of inappropriate conduct that may adversely impact an individual's employment, performance, or emotional well-being.

As a responsible and ethical organization, Monedo adopts a zero-tolerance approach towards sexual harassment at the workplace and is committed to ensuring compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and applicable rules thereunder.

- Prevent and prohibit all forms of sexual harassment at the workplace, whether physical, verbal, non-verbal, written, visual, or virtual in nature.
- Promote a culture of mutual respect, professionalism, equality, and accountability across all levels of the organization.
- Provide a secure and enabling environment for employees, interns, consultants, contract workers, trainees, vendors, and visitors.
- Establish a robust, fair, confidential, and transparent grievance redressal mechanism for addressing complaints related to sexual harassment.
- Ensure timely inquiry, appropriate action, and protection against retaliation for individuals who raise concerns in good faith.
- Extend protection to employees working from office locations, remote locations, hybrid setups, virtual workplaces, online communication platforms, and during official travel or business interactions.
- Encourage awareness and sensitization regarding workplace conduct, gender sensitivity, and prevention of harassment through regular communication and training initiatives.
- Reinforce Monedo's commitment to responsible business practices, ethical conduct, employee well-being, and a workplace culture built on trust, transparency, inclusivity, and fairness.

Monedo expects every employee and associated individual to uphold the spirit and intent of this Policy and contribute towards creating a workplace where everyone is treated with dignity, courtesy, and respect.

## Scope of the Policy

Monedo Financial Services Pvt. Ltd. is committed to ensuring that every employee, intern, consultant, contract worker, and associated stakeholder has access to a safe, respectful, and harassment-free workplace. Therefore, the policy is applicable to:

- Permanent employees
- Probationers and trainees
- Interns (paid or unpaid)
- Apprentices
- Contractual employees
- Consultants and retainers
- Gig workers and temporary staff
- Employees of vendors/service providers
- Visitors and clients

The Policy also applies to work-from-home arrangements, virtual workplaces, online meetings, official chats, emails, and all digital communication platforms.

## Definition of Sexual Harassment

Sexual harassment refers to any unwelcome act, behavior, conduct, or communication of a sexual nature that directly or indirectly creates an intimidating, hostile, offensive, humiliating, or unsafe work environment. It may include physical contact and advances, requests for sexual favours, sexually coloured remarks, inappropriate jokes, sharing offensive content, unwelcome verbal or non-verbal gestures, or any form of physical, verbal, written, visual, or virtual conduct that violates an individual's dignity and personal boundaries. Sexual harassment may occur at the workplace, during official interactions, business travel, virtual meetings, or through digital communication platforms. Sexual harassment includes any unwelcome act or behaviour such as:

- Physical contact and advances
- Demand or request for sexual favours
- Sexually coloured remarks
- Showing pornography
- Sending inappropriate digital messages, emails, or content
- Any unwelcome verbal, non-verbal, physical, or virtual conduct of a sexual nature

## Workplace Responsibilities

At the workplace, all employees are expected to maintain the highest standards of professional conduct and ensure a respectful, safe, and inclusive environment for everyone. Any form of sexual harassment or behaviour that violates expected workplace norms is strictly prohibited and will not be tolerated. In addition to this shared responsibility, Monedo Financial Services has constituted an Internal Complaints Committee (ICC) to ensure that any complaints or concerns regarding non-adherence to expected standards of behaviour are addressed promptly. All employees are therefore expected to:

- Maintain professional conduct
- Respect dignity and privacy
- Refrain from harassment
- Cooperate during investigations
- Report incidents in good faith

## Internal Complaints Committee (ICC)

Monedo Financial Services Pvt. Ltd. has constituted an Internal Complaints Committee (ICC) in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to ensure a safe, secure, and respectful workplace for all employees and associated individuals. The ICC comprises trained internal members and an independent external member to ensure fair, unbiased, and confidential handling of complaints related to sexual harassment.

All employees, interns, trainees, consultants, contract workers, and other stakeholders are encouraged to promptly report any incident of sexual harassment without fear of retaliation. Employees may reach out directly to any ICC member, write to the official POSH email ID at [posh@monedo.in](mailto:posh@monedo.in), or raise a complaint through the Government of India's SHe-Box Portal available at [SHe-Box Portal](#).

<b>Member</b>	<b>Role</b>	<b>Email</b>	<b>Phone Number</b>
Sumita Almeida	Presiding Officer	<a href="mailto:sumita.almeida@monedo.in">sumita.almeida@monedo.in</a>	022-68173350
Ashish Kohli	Internal Member	<a href="mailto:ashish.kohli@monedo.in">ashish.kohli@monedo.in</a>	022-68173303
Karanjeet Gambhir	Internal Member	<a href="mailto:karanjeet.gambhir@monedo.in">karanjeet.gambhir@monedo.in</a>	022-68173307
Sangeeta Paleker	External member	<a href="mailto:sangeetapalekar23@gmail.com">sangeetapalekar23@gmail.com</a>	9967535989

## Complaint Redressal Mechanism

Monedo Financial Services Pvt. Ltd. is committed to providing a transparent, accessible, and effective grievance redressal mechanism for addressing complaints related to sexual harassment at the workplace. Any employee, intern, trainee, consultant, contractual worker, or associated stakeholder who experiences or witnesses sexual harassment is encouraged to report the incident promptly without fear of retaliation or discrimination.

Complaints may be submitted in writing within three months from the date of the incident or the last incident in case of a series of incidents. Employees may raise concerns through the

- official POSH email ID- [posh@monedo.in](mailto:posh@monedo.in)
- the Human Resources Department,
- their reporting manager,
- or directly to any member of the Internal Complaints Committee (ICC)
- through the Government of India's SHe-Box Portal for additional support and escalation

The Company assures all complainants that every complaint shall be handled with utmost sensitivity, confidentiality, fairness, and professionalism. Monedo further ensures that no employee shall suffer adverse treatment, retaliation, intimidation, or victimization for raising a concern in good faith under this Policy.

## Inquiry Process

Upon receipt of a complaint, the Internal Complaints Committee (ICC) shall initiate a fair, impartial, and confidential inquiry in accordance with the provisions of the POSH Act, 2013.

The ICC shall acknowledge the complaint and provide both the complainant and the respondent with an opportunity to present their statements, evidence, and witnesses.

During the inquiry process, principles of natural justice shall be followed to ensure fairness and transparency for all parties involved. The identity of the complainant, respondent, witnesses, and all related proceedings shall remain strictly confidential throughout the investigation.

The ICC may conduct interviews, review documentary evidence, examine electronic communication, and interact with witnesses wherever necessary to establish the facts of the matter. The inquiry shall ordinarily be completed within a period of ninety days from the date of receipt of the complaint, and the findings shall be submitted to the Management for necessary action. Pending completion of the inquiry, the ICC may recommend interim relief measures such as transfer, leave, work-from-home arrangements, or restriction of contact between the concerned parties to ensure the safety and well-being of the complainant.

## Disciplinary Action

Monedo Financial Services Pvt. Ltd. adopts a zero-tolerance approach towards sexual harassment and shall take appropriate disciplinary action against any individual found guilty of misconduct following the conclusion of the inquiry process. Depending on the severity, nature, and impact of the misconduct, disciplinary action may include

- a written apology, warning, reprimand,
- counselling, mandatory sensitization training,
- withholding of promotion or increment,
- suspension,
- or termination of employment or contract.

The Company reserves the right to initiate legal proceedings or report the matter to law enforcement authorities wherever the act constitutes an offence under applicable laws. In cases involving vendors, consultants, or third-party associates, the Company may terminate business associations or deny access to the workplace. Disciplinary measures shall be determined based on the findings and recommendations of the ICC and shall be implemented within the timelines prescribed under the POSH Act. Monedo is committed to ensuring that corrective action is proportionate, fair, and aimed at maintaining a safe and respectful workplace culture. The Company also reserves the right to undertake additional preventive or reformative measures to avoid recurrence of similar incidents in the future.

## False Complaints

Monedo Financial Services Pvt. Ltd. encourages employees and associated individuals to report concerns related to sexual harassment in good faith and without hesitation. At the same time, the Company recognizes that knowingly false or malicious complaints can adversely affect individuals and workplace harmony. If, after completion of the inquiry, the ICC concludes that a complaint was

- intentionally false
- fabricated,
- or made with malicious intent

appropriate disciplinary action may be initiated against the complainant in accordance with Company policies and applicable laws. However, inability to substantiate a complaint or provide adequate evidence shall not automatically lead to action against the complainant.

The Company understands that incidents of harassment may occur in circumstances where direct evidence may not always be available. Therefore, no employee shall be penalized merely because a complaint could not be proved during the inquiry. Monedo remains committed to creating a supportive environment where employees feel safe to report concerns without fear of victimization or unnecessary scrutiny. The intent of this provision is to prevent misuse of the Policy while continuing to protect genuine complainants and uphold the integrity of the grievance redressal process.

## Confidentiality

Monedo Financial Services Pvt. Ltd. recognizes the sensitive nature of complaints related to sexual harassment and is committed to maintaining strict confidentiality throughout the complaint resolution process.

- All information relating to complaints, witness statements, evidence, inquiry proceedings, recommendations, and actions taken shall be treated as confidential and shared strictly on a need-to-know basis.
- The identity of the complainant, respondent, witnesses, ICC members, and any related documents shall not be disclosed to unauthorized persons under any circumstances.
- Employees involved in the process, including witnesses and committee members, are expected to maintain complete confidentiality and professionalism.
- Any unauthorized disclosure of information related to the complaint or inquiry may attract disciplinary action under Company policy and applicable law.
- Confidentiality is essential to ensure fairness, protect the dignity and privacy of all parties involved, and encourage employees to report incidents without fear or hesitation.

Monedo is committed to ensuring that all inquiries are conducted in a respectful and discreet manner that safeguards the interests and reputation of everyone associated with the process.

## Protection Against Retaliation

Monedo Financial Services Pvt. Ltd. strictly prohibits retaliation, victimization, intimidation, or adverse treatment against any employee who raises a complaint, participates in an inquiry, acts as a witness, or supports an individual reporting sexual harassment in good faith.

The Company believes that every individual should feel safe and empowered to report inappropriate conduct without fear of negative consequences.

Retaliation may include threats, demotion, discrimination, exclusion from work-related activities, hostile behavior, adverse performance reviews, or any action intended to discourage reporting or participation in the inquiry process.

**Any act of retaliation shall be treated as a serious violation of Company policy and may result in disciplinary action independent of the original complaint.** Managers, supervisors, and employees are expected to uphold a respectful work environment and ensure that complainants and witnesses are not subjected to unfair treatment.

The ICC and the Human Resources Department shall closely monitor situations where retaliation concerns may arise and take immediate corrective measures wherever necessary. Monedo remains committed to fostering a culture of trust, fairness, accountability, and psychological safety across the organization.

## Display of POSH Policy

In compliance with the provisions of the POSH Act, 2013, Monedo Financial Services Pvt. Ltd. shall prominently display the POSH Policy and related information at all office locations and relevant employee communication platforms. The display shall include:

- details of the Internal Complaints Committee (ICC), contact information of ICC members
- the POSH complaint email ID
- the rights and responsibilities of employees under the Policy

The Company shall also display the penal consequences of sexual harassment and misconduct as prescribed under applicable laws to create awareness and deter inappropriate behavior.

Relevant information may additionally be shared through the Company intranet, employee handbooks, induction programs, emails, and awareness campaigns. Monedo believes that visibility and awareness of the Policy are essential in promoting a safe, respectful, and inclusive work culture. Regular POSH awareness sessions, sensitization workshops, and training programs shall be conducted to educate employees regarding acceptable workplace behavior and grievance redressal procedures. The Company is committed to ensuring that all employees, including remote workers, interns, and contractual staff, have easy access to POSH-related information and support mechanisms.

## Penal Consequences Under the POSH Act

Sexual harassment at the workplace is a serious violation of an individual's dignity and is strictly prohibited under the POSH Act, 2013, as well as Monedo's internal policies. Any employee or associated individual found guilty of engaging in sexual harassment may face severe disciplinary and legal consequences depending on the nature and gravity of the misconduct. Such consequences may include

- Censure or Warning
- With-holding of increment(s) or promotion
- Demotion/reduction to a lower grade or position
- Reduction in Salary
- Discharge from the services,
- Dismissal (without terminal benefits)
- Termination from the services

In serious cases, the Company may also initiate legal proceedings or file a police complaint/FIR under relevant provisions of applicable laws, including the Indian Penal Code.

Monedo shall cooperate fully with legal authorities in matters involving criminal misconduct or unlawful behaviour

## SHe-Box Portal

In addition to the internal grievance redressal mechanism, employees may also register complaints related to workplace sexual harassment through the Government of India's SHe-Box Portal (Sexual Harassment Electronic Box). The SHe-Box Portal is an online complaint management platform developed by the Ministry of Women and Child Development to provide an accessible and centralized mechanism for reporting incidents of workplace sexual harassment.

Employees may use the portal to submit complaints, seek assistance, and track the status of their cases online. Monedo encourages employees to utilize all available support mechanisms to ensure their concerns are addressed appropriately and without delay.

**Filing a complaint through the SHe-Box Portal does not restrict an employee from simultaneously approaching the Internal Complaints Committee (ICC) of the Company.**

The Company remains committed to extending full cooperation and support during any inquiry or investigation initiated through the portal or competent authorities. Employees can access the portal through the official Government website at [SHe-Box Portal](#).

## Policy Review

This Policy shall be reviewed periodically and updated in line with applicable laws.

Registered Office:

Monedo Financial Services Pvt. Ltd.

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Andheri (East), Mumbai – 400059, Maharashtra, India