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Title POSH Policy

	NAME	TITLE	SIGNATURE	DATE
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Reviewer/	Abhinav Suri	Director		17 th Jun 2025
Authoriser	Abhinav Suri	Director		17 th Jun 2025

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Change History

SOP no.	Effective Date	Significant Changes	Previous SOP no.
1.0	1-Jan-2025	NA	STR/POSH/V.1.0/2025-26
1.1	12-Nov-2025	NA	STR/POSH/V.1.1/2025-26

StrideOne Capital Private Limited on Prevention, Prohibition & Redressal of Sexual

1. Purpose and Objective

In pursuance of the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (the "POSH Act"), and its applicable rules, StrideOne Capital Private Limited ("the Company") is committed to providing a workplace free of any form of sexual harassment. The purpose of this Policy is to ensure a work environment that promotes dignity, respect, and equality for all employees. This policy applies to all persons, irrespective of their gender, working at or associated with the Company, including employees, contract workers, trainees, visitors, clients, and other third parties.

This policy aims to:

- Prevent, prohibit, and address instances of sexual harassment within the Company.
 - Provide a clear, transparent, and timely mechanism for addressing complaints of sexual harassment.
 - Ensure the safety, dignity, and respect of all employees, creating an environment free from discrimination, intimidation, and humiliation.
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2. Definition of Sexual Harassment

For the purpose of this Policy, sexual harassment is defined in accordance with the POSH Act, 2013, and shall include but not be limited to the following:

1. **Physical Contact and Advances:** Any unwelcome physical contact, advances, or any attempt to establish physical intimacy.
2. **Demand or Request for Sexual Favors:** Any request or demand, whether explicit or implied, for sexual favors in exchange for work-related advantages or benefits.
3. **Verbal Harassment:** Making unwelcome remarks or comments of a sexual nature, including jokes, slurs, and sexual innuendos, either in person or through any form of communication (email, phone, text).
4. **Non-Verbal Harassment:** Any behavior that may include, but is not limited to, sexually explicit gestures, pictures, posters, emails, or inappropriate visual conduct, which create a hostile environment.
5. **Any Other Unwelcome Behavior:** Any other unwelcome behavior, act, or conduct that is of a sexual nature and has the effect of intimidating, hostile, or offensive behavior.

Sexual harassment can occur within or outside the workplace, including during work-related events, business trips, and social gatherings related to work.

3. Scope of the Policy

This policy applies to:

- **All Employees:** Permanent, temporary, contract workers, interns, trainees, or any individual working with the Company.
- **Third Parties:** Visitors, clients, contractors, and any other persons who come in contact with the Company's employees in the course of their work.
- **Workplace Locations:** The Company premises, including office spaces, restrooms, cafeterias, parking lots, and any other place used for work-related activities, including work-related social functions, and online/virtual meetings and communications.

The policy applies to incidents occurring at any place where the employee is required to be or present during the course of their employment, whether on the Company's premises or outside, during business travel, or work-related social activities.

4. Internal Complaints Committee (ICC)

In compliance with the POSH Act, the Company has constituted an Internal Complaints Committee (ICC) to provide a safe, efficient, and accessible mechanism for handling complaints related to sexual harassment.

The ICC will be comprised of the following members:

- **Presiding Officer:** Ruby Dua
- **Member:** Ritika Bhatia
- **Member:** Arvind Nachaya
- **Member:** Hardeep Singh
- **Member:** Abhinav Suri
- **External Member:** Vanita Bhatnagar

The ICC is entrusted with the following responsibilities:

- **Receiving Complaints:** The ICC shall receive complaints of sexual harassment from employees or third parties who feel that they have been subjected to sexual harassment at the workplace.
 - **Investigating Complaints:** The ICC shall investigate complaints in a fair, transparent, and timely manner, ensuring confidentiality and impartiality.
 - **Recommendations for Action:** Based on its findings, the ICC will recommend appropriate disciplinary action, including termination, suspension, or other sanctions.
 - **Ensure Non-Retaliation:** The ICC shall ensure that no person who files a complaint of sexual harassment or participates in the investigation process is subjected to retaliation or victimization.
 - **Confidentiality:** The ICC shall maintain strict confidentiality during the process of inquiry and investigation, disclosing information only on a need-to-know basis.
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5. Procedure for Filing Complaints

Any person who believes they have been subjected to sexual harassment should promptly file a complaint with the ICC. The following procedure will be followed:

1. Filing a Complaint:

- A complaint may be submitted in writing to any member of the ICC.
- Complaints may be filed within **three months** from the date of the alleged incident of sexual harassment.
- Complaints may also be submitted verbally, with the ICC member recording the details of the complaint in writing.

2. Complaint Acknowledgment:

- Upon receipt of a complaint, the ICC shall acknowledge receipt of the complaint within **7 working days** and begin an inquiry within **15 days**.

3. Investigation Process:

- The ICC shall initiate an investigation into the complaint, which will include interviews with the complainant, the respondent, and any relevant witnesses.
- The ICC shall complete the investigation within **60 days** from the date of receipt of the complaint, and submit a report with findings and recommendations to the management.

4. Action on Findings:

- The management shall take appropriate action in accordance with the recommendations of the ICC within **15 days** from the receipt of the report.

- If the complaint is substantiated, the respondent may face disciplinary actions, including suspension, termination, or other actions as deemed necessary.
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6. Confidentiality

The Company recognizes the importance of confidentiality in handling complaints of sexual harassment. Therefore, all complaints, investigations, and actions taken as a result of this policy will be conducted with the utmost confidentiality. Any breach of confidentiality by any party involved in the process shall be considered a serious violation and may lead to disciplinary action.

7. Retaliation and Victimization

The Company strictly prohibits any form of retaliation, victimization, or discrimination against individuals who file complaints of sexual harassment or cooperate with an investigation. Any retaliatory behavior will result in disciplinary action. Similarly, any false or malicious complaints made with an intent to harm or discredit a colleague will also be subject to disciplinary action.

8. Penalties for Sexual Harassment

Upon a finding of sexual harassment, the ICC may recommend the following actions based on the severity of the incident:

1. **Warning:** A verbal or written warning to the respondent.
 2. **Suspension:** Temporary suspension from the workplace or certain work duties for a specified period.
 3. **Termination:** Permanent termination of employment in cases of severe or repeated offenses.
 4. **Legal Action:** In case of criminal conduct, the Company may report the matter to law enforcement authorities for further action under the Indian Penal Code or other relevant laws.
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9. Training and Awareness

The Company shall provide regular training and awareness programs to all employees regarding their rights and responsibilities under this Policy, as well as the process for reporting sexual harassment. The training will also include educating employees on the legal framework governing sexual harassment and its implications.

10. False Complaints and Malicious Intent

The filing of false complaints or malicious intent to harm an individual's reputation, career, or well-being is strictly prohibited. Any individual found to have filed a false or malicious complaint shall face appropriate disciplinary actions, including termination of employment or legal action if warranted.

11. Review of the Policy

This policy will be reviewed annually by the management and the ICC to ensure its effectiveness. Any amendments or updates to the policy will be communicated to all employees and stakeholders of the Company.

12. Contact Information

For any queries or to file a complaint, employees may contact any member of the Internal Complaints Committee at the following:

- **Email:** posh@strideone.in
 - **ICC Members:** Refer to annexure A
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Date of Approval: January 1, 2025
Approved by: Ishpreet Gandhi (Director) and Abhinav Suri (Co-Founder)

This policy is a critical part of StrideOne Capital Private Limited's commitment to ensuring a respectful and dignified workplace for all employees. All employees are expected to read, understand, and comply with the terms of this policy.



Annexures:

- **Annexure A:** Details of Internal Complaints Committee
 - **Annexure B:** Indicative format for complaint
 - **Annexure C:** Indicative format for response to the complaint
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This POSH policy is designed to ensure compliance with the relevant legal frameworks and to protect the interests of all individuals associated with the Company. Please let me know if you need further customization or legal references.

Annexure A

The following are the members of the **Internal Complaints Committee** as per the resolution passed at the meeting held on 1 January 2025:

Name	Email
Ruby Dua	Ruby.dua@strideone.in
Ritika Bhatia	ritika.bhatia@strideone.in
Hardeep Singh	hardeep@strideone.in
Arvind Nachaya	arvind@strideone.in
Abhinav Suri	abhinav@strideone.in
Vanita Bhatnagar (External Member)	thejiyuufoundation@gmail.com



Section1 : Details of the complainant	
Name	
Designation	
Division/ Unit/ Department	
Contact Number	
Email Address	
Relationship with the aggrieved if someone else filing on their behalf	
Section 2 : Details against whom the complainant is made	
Name	
Designation	
Division/ Unit/ Department	
Contact Number	
Section 3 : Details of the incident	
Details	
Date & Time (If you can recall)	
Details of witness/witnesses if any	
Any other relevant information	



Annexure C: Indicative format for response to the complaint

Section1 : Details of the Respondent	
Name	
Designation	
Division/ Unit/ Department	
Contact Number	
Email Address	
Relationship with the aggrieved if someone else filing on their behalf	
Section 3 : Response to the complainant	
Details	
Date & Time (If you can recall)	
Details of witness/witnesses if any	
Any other relevant information	