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**POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN WORKPLACES**

**WEALTH FIRST PORTFOLIO MANAGERS LIMITED**

**Version: 2.0 (Approval Date: 27/01/2025)**

**OBJECTIVE**

Wealth First Portfolio Managers Limited ("Company") is committed to create and maintain a secure work environment where its Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business. Our Company is committed to creating a healthy working environment that enables employees to work without Fear of Prejudice, Gender Bias and a Harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, gender, age, marital status, nationality, ethnic origin or disability.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. All concerned should take cognizance of the fact that Wealth First Portfolio Managers Limited strongly opposes sexual harassment, and that such behaviour against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed there under being the Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment. Making a false complain of sexual harassment or providing false information regarding a complain will also be treated as a violation of a Policy.

Violation of this Policy will cast for strict disciplinary action upto and including termination.

**SCOPE**

Wealth First's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. Our Company encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy. Wealth First's Policy against Sexual Harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsource employees.



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Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with immediate effect.

## **DEFINATION**

**(i) Aggrieved Individual:**

“An aggrieved individual”, in relation to a workplace, is a person, of any age, whether an employee or not, who alleges to have been subjected to any act of Sexual Harassment.

**(ii) Company:**

“Company” means Wealth First Portfolio Managers Limited.

**(iii) Complainant:**

A Complainant is any aggrieved individual (if the aggrieved individual is unable to make complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

**(iv) Employee:**

“Employee” means a person employed with the Company for any work on permanent, deputation, temporary, consultants, part time or daily wage basis, either directly or through an agent, including contractor, with or without the knowledge of principal employer, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

**(v) Respondent:**

“Respondent” means the person against whom the Complainant has made a complaint.

**(vi) Sexual Harassment:**

“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) such as:

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making Sexually colored remarks; or
- Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
- Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or
- implied or explicit promise of preferential treatment in their employment;
- implied or explicit threat about their present or future employment status;
- implied or explicit threat of detrimental treatment in their employment;
- Humiliating treatment likely to affect the health and safety of the aggrieved person;



- Interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.

In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of a female employee, will be considered as sexual harassment.

**(vii) Work Place:**

- Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.
- Places visited by Employee arising out of or during the course of employment including official events, transportation, and accommodation provided by the employer for undertaking such journey.

**INTERNAL COMPLAINTS COMMITTEE/ COMPLAINT REDRESSAL COMMITTEE:**

Every complaint received shall be forwarded to internal complaint committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose. Internal Complaints Committee has been constituted of the following members as nominated by the Company:

- (i) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- (ii) Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- (iii) One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

The Name of the Members of the Internal Complaints Committee is as per **Annexure A** of this Policy and any change in such composition shall be effected in the policy.

Atleast half the total members of the Committee have to be women. The Presiding Officer and every member shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

**ACTION:**

The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.

- (i) If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
- (ii) If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:





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- Take action for sexual harassment as a misconduct.
  - To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
  - To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- (iv) Such action will be taken within 60 days of the receipt of report.

**FALSE ACCUSATIONS:**

- (i) The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
- (ii) If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee concludes, that he/she has given false evidence or produced forged or misleading documents.
- (iii) It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Wealth First Portfolio Managers Limited recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

**MODIFICATION:**

The Board of Directors of the Company shall have full discretion and power to amend this Policy as and when it deems necessary.



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**CONCLUSION:**

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.



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**ANNEXURE-A**

**NAME OF THE MEMBERS OF THE INTERNAL COMPLAINTS COMMITTEE**

Sr. No.	Name	Designation
01	Payal Shah	Nodal Officer/Presiding Officer
02	Nirad Shah	Member
03	Chaula Bhatt	Member
04	Smruti Shah	Member

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