



# **NON-DISCRIMINATION AND ANTI- HARASSMENT POLICY FOR EMPLOYEES**

**Digamber Capfin Limited**



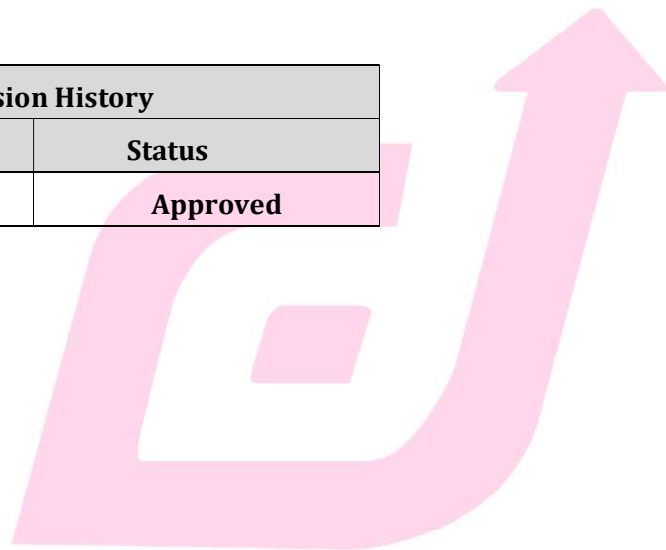
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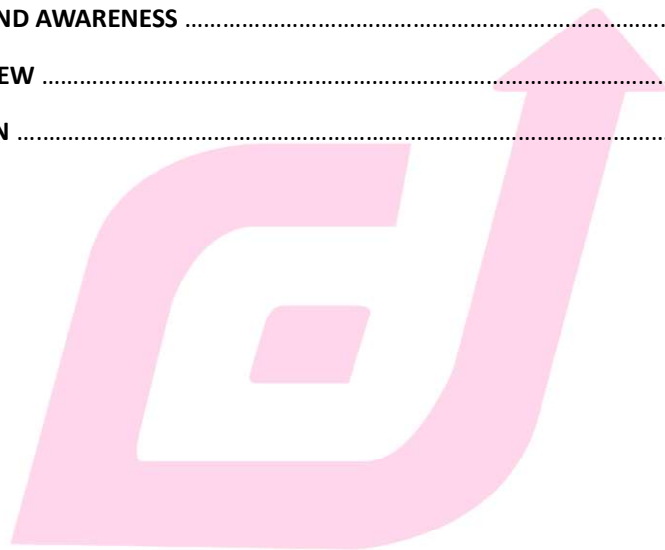
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## **1. INTRODUCTION**

Digamber Capfin Limited (“the Company”) strives to create and maintain a work environment where every employee is treated with dignity, decency, fairness, and respect.

The Company believes that a healthy environment of workplace must be characterized by mutual trust, professionalism, inclusiveness, and the absence of intimidation, oppression, exploitation, or harassment of any kind.

Through the enforcement of this policy and by educating employees, Digamber Capfin Limited seeks to prevent, correct, and discipline behaviors that violate this policy.

The company has developed this policy to provide all the employees with the opportunity to work in an environment free from persecution for reporting violations of this policy, discrimination and harassment.

The company will take all reasonable efforts to ensure that everyone covered by this policy knows that any complaint of its violation will be properly considered and processed.

## **2. POLICY COMMITMENT**

The Company guarantees the following:

### **1. Zero-Tolerance Approach**

Digamber Capfin Limited adopts a zero-tolerance approach against discrimination, harassment, bullying, or retaliation in any form. This applies to all employees regardless of position or seniority.

### **2. Equal Responsibility**

Every employee is expected to comply with this policy and ensure prohibited conduct does not occur in the workplace.

### **3. Managerial Accountability**

Managers and supervisors who knowingly allow, ignore, or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), will be considered in violation of this policy and subject to disciplinary action.

### **4. Strict Disciplinary Measures**

Violations may lead to disciplinary actions including verbal or written warnings, suspension, or termination of employment depending on the seriousness of the offense.

## **3. SCOPE OF THE POLICY**

This policy applies to:

- All permanent and contractual employees
- Trainees, interns, consultants, external suppliers, customers and temporary staff
- Directors and senior management

- Any person working for or representing Digamber Capfin Limited

This policy covers conduct occurring:

- At Company premises
- During official travel like business trips, business meetings, business-related public events
- At Company-sponsored events
- In any work-related interaction (physical or digital)

#### **4. DISSEMINATION AND IMPLEMENTATION**

##### **4.1 Non-Discrimination**

Digamber Capfin Limited strictly prohibits discrimination in matters relating to:

1. Employment opportunities
2. Compensation, benefits, or privileges
3. Promotion, training, or career advancement
4. Work assignments or to create a discriminatory work conditions
5. Performance evaluation standards

Discrimination on the basis of the following is prohibited:

- Race or color
- National origin
- Age
- Religion
- Disability status
- Sex or gender
- Sexual orientation
- Gender identity or expression
- Marital status
- Genetic information or any other protected characteristic

##### **4.2 Harassment**

Harassment refers to any kind of verbal, physical, or psychological conduct designed to threaten, intimidate, coerce, or offend an employee, co-worker, or any person working on behalf of the Company.

The Company is committed to providing a workplace that is free from abusive, offensive, or harassing behavior.

Employees who feel harassed or discriminated against can freely report the incident to their manager or the Human Resources Department.

Harassment includes but is not limited to:

- Bullying
- Abusive or intimidating treatment
- Offensive language or gestures
- Disorderly conduct
- Workplace violence
- Sexual harassment
- Any conduct interfering with an employee's ability to work

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- a) Spreading rumors or malicious untruths
- b) Shouting or aggressive behavior
- c) Ridiculing or dismissing achievements
- d) Public humiliation
- e) Speaking in a condescending or belittling way
- g) Swearing or insulting remarks
- h) Dismissive or negative gestures
- i) Refusing communication on work related matters
- j) Discounting the person's thoughts or feelings in meetings
- k) Persistent negative criticism without justification
- l) Domineering or uncooperative conduct and behavior
- m) Undermining work or authority or goodwill between colleagues
- n) Offensive comments on protected characteristics
- o) Display/distribution of derogatory written or graphic material

Courteous, mutually respectful, pleasant, non-coercive interactions between employees at workplace are appropriate and acceptable to and welcomed by both parties as well as displeasure on wrong work and giving warnings for improvement of performance and other related actions are not considered to be harassment.

#### **4.3 Sexual Harassment**

While the Company complies with the policy of Prevention of Sexual Harassment at Workplace (POSH) Act, 2013 which specifically addresses the protection of women at workplace against sexual harassment, Digamber Capfin Limited recognizes the right of all employees, irrespective of gender, to work in a safe environment free from verbal or physical abuse. Hence, the company adopts this policy with gender neutrality to ensure redressal against all types of harassment to employees.

Sexual harassment in any form is strictly prohibited and will be addressed immediately.

#### **5. RETALIATION**

The Company prohibits retaliation against any employee who:

1. Files or responds to a bona fide complaint of discrimination or harassment
2. Appears as a witness in the investigation of a complaint

3. Serves as an investigator or supports a complaint

No hardship, loss, penalty, or adverse employment action will be imposed for raising genuine concerns.

Lodging a bona-fide complaint will in no way be used against the employee or have an adverse impact on that individual's employment status.

However, filing groundless, malicious or knowingly false complaints will be treated as misconduct and may lead to disciplinary action including termination or suspension of employment.

## **6. CONFIDENTIALITY**

All complaints and investigations will be treated confidentially to the extent possible and information will be disclosed strictly on a need-to-know basis.

The identity of the complainant may be revealed during the investigation process, but the Company will ensure that the complainant is protected from retaliation during and after the process of investigation.

All records related to complaints will be maintained securely within the HR Department.

## **7. COMPLAINT PROCEDURE**

Digamber Capfin Limited has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat the whole procedure confidentially to the extent possible.

1. Complaints should be submitted as soon as possible after an incident has happened, preferably in writing.
2. Upon receiving a complaint of the violation of the policy, the HR Head will notify senior management and review the complaint with the company's legal counsel if required and refer the matter to the disciplinary committee for further action.
3. A Disciplinary/Inquiry Committee will initiate an investigation to determine whether there is a reasonable basis for the complaint to ensure the violation of the policy.
4. If necessary, the complainant and respondent may be separated during investigation through internal transfer or administrative leave.
5. The Committee will interview the complainant, respondent, and witnesses to determine whether the alleged conduct happened.
6. Upon completion of an investigation, a written report will be submitted by the committee of their opinions and findings, with recommendations for disciplinary or preventive action.
7. Senior management will review the report and decide the final action. The final action will depend on following factors:-
  - a. the gravity, severity and frequency of the misconduct,
  - b. prior complaints made by the complainant
  - c. prior complaints made against the respondent

- d. the authenticity of evidence
- 8. HR will communicate the final decision made by the senior management and disciplinary action so taken to the concerned parties and its consequences and how it will be executed.

**8. TRAINING AND AWARENESS**

Digamber Capfin Limited will ensure continuous training and awareness programs and sessions for all employees, including:

- Induction training for new hires as well as existing employees
- Periodic refresher sessions
- POSH and workplace conduct modules
- Online learning assessments where applicable

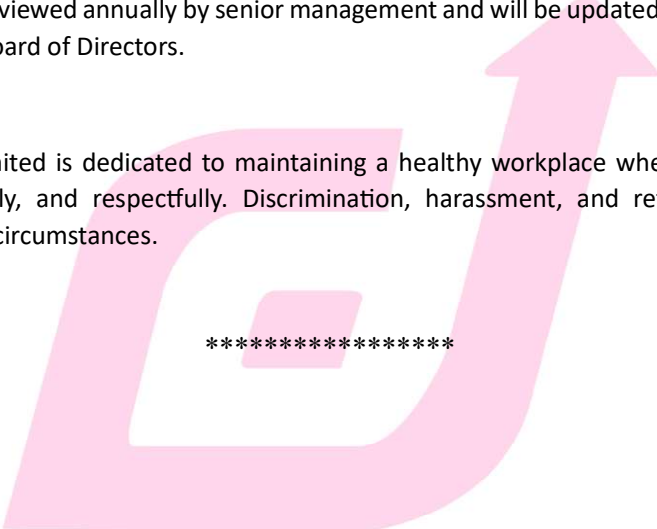
**9. POLICY REVIEW**

This policy shall be reviewed annually by senior management and will be updated as necessary, subject to approval by the Board of Directors.

**10. CONCLUSION**

Digamber Capfin Limited is dedicated to maintaining a healthy workplace where all individuals are treated equally, fairly, and respectfully. Discrimination, harassment, and retaliation will not be tolerated under any circumstances.

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