

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

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1. OBJECTIVE

At Cars24, we have zero tolerance for sexual harassment in the workplace. We aim to create an inspiring and empowering environment where all employees can do their best work and grow. We are committed to ensuring that our workspace is safe, free from discrimination and harassment and everyone is treated with dignity and respect. This POSH policy has been developed to prevent and address sexual harassment and ensure compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013, and the Cars24 [Code of Conduct Policy](#).

2. APPLICABILITY

This policy applies to **Cars24 Services Private Limited (“CSPL”)** and Cars24 Financial Services Private Limited (**“CFSPL”**), and their respective affiliates, subsidiaries, and group entities incorporated in India (collectively referred to as the **“Cars24” or “Company”**).

This policy applies to all employees, contractors, trainees, visitors, and business associates of Cars24 across all locations, including those on remote or hybrid work arrangements.

This policy applies to all Cars24 offices, business locations, and any space where Cars24 conducts business. This includes:

- All business locations of Cars24
- Company-sponsored events, team gatherings, and social occasions
- External locations visited by employees while on official duty
- Virtual meetings and interactions, social media, and electronic communications with work-related consequences

3. DEFINITION OF SEXUAL HARASSMENT

“Sexual harassment at the workplace” includes any unwelcome sexual behavior, such as:

- Physical contact and advances, and violation of personal space
- Requests for sexual favors
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

Further examples include quid pro quo harassment and creating a hostile work environment through verbal or physical conduct of a sexual nature.

4. INTERNAL COMPLAINTS COMMITTEE (ICC)

The ICC is responsible for addressing complaints of sexual harassment. The committee consists of senior members and external representatives as required by law. Two types of committees are constituted namely **Core Complaints Redressal Committee (North Region)** and **Site Complaints Redressal Committee (West, South, East)**, consisting of Presiding Officer, two members with legal expertise or interest in women's issues and external NGO members. For Core Committee details, [click here](#).

5. REPORTING SEXUAL HARASSMENT AND PROCESS OF DEALING WITH COMPLAINTS

If you believe you have been subjected to sexual harassment, you may file a complaint by emailing icc@Cars24.com or speakup@Cars24.com. Include details of the circumstances, dates, and witnesses, if any.

- **Timeline:** Complaints must be filed within 3 months of the incident, or the last occurrence in a series of incidents. Delayed complaints may be considered only under extraordinary circumstances.
- **Anonymous Complaints:** Discouraged as details are essential for a formal investigation.
- **Assistance:** If unable to file a written complaint, contact an ICC member for help. With consent, a colleague, friend, or any knowledgeable person can file the complaint on the aggrieved person's behalf.

Responsibility:

- All employees must prevent and report workplace harassment. Managers must promote awareness and report incidents brought to their attention.
- Employees are required to assist in investigations, and participation is mandatory.

Protection:

- Complainants, whistle-blowers, and witnesses shall be protected from exposure, retaliation, or hostility. Any retaliation will lead to strict disciplinary action.
- False testimonies or forged documents or misleading documents may result in termination.

To understand the details of complaint redressal procedure and the manner of dealing with complaints, [click here](#).

6. CONCILIATION

Before starting an inquiry, the Internal Complaints Redressal Committee (ICRC) can help settle the matter between the aggrieved woman and the respondent if the aggrieved woman requests it.

If a settlement is reached:

- The ICRC will give copies of the settlement to both parties.
- A copy will also be shared with the employer, recommending no further inquiry.

Important: Monetary settlements are not allowed during conciliation.

7. RELIEF TO THE AGGRIEVED PERSON DURING PENDENCY OF INQUIRY

The Internal Complaint Redressal Committee at the written request of the aggrieved person may recommend to the employer to –

- a. Restrain the respondent from reporting on the work performance of the aggrieved person
- b. Depute the aggrieved person to another officer.
- c. Transfer the aggrieved person or respondent to another workplace.

8. DECISIONS AND ACTIONS

If the ICC finds evidence of harassment, the respondent may face disciplinary actions, including warnings or termination.

If the ICC concludes that a complaint is malicious, knowingly false, or supported by forged or misleading evidence, it can recommend disciplinary action against the complainant.

Additional Considerations:

- Insufficient evidence does not make a complaint malicious.
- The ICC ensures that victims and witnesses are not victimised or discriminated against.
- Abuse of the procedure, such as knowingly making false allegations, will result in disciplinary action.

9. CONFIDENTIALITY & PENALTY FOR VIOLATION

Confidentiality will be maintained throughout the investigation to protect all parties involved.

- Records, including meeting details and investigation outcomes, will remain confidential unless required for disciplinary or remedial actions.

- The identity, address, or any related information of those involved must not be disclosed to the public, press, or media.

Any breach of confidentiality will result in penalties.

10. PROTECTION TO COMPLAINT / VICTIM

The Company is committed to protecting employees who report harassment from any form of retaliation, which will result in disciplinary action. Victims and witnesses will not face discrimination or victimisation. However, anyone who falsely or maliciously uses the procedure will face disciplinary action.

11. AMENDMENT

The Chief Financial Officer/ Legal Counsel/ Company Secretary/ HR-Head of the Company have the rights to amend or modify this policy, at any time and without assigning any reason and revised Policy shall be noted by the Board in any of its forthcoming meetings.

12. COMPLIANCE

All employees are required to comply with this policy. The ICC is responsible for this. overseeing its enforcement. To report a violation of the code, please write to icc@Cars24.com or speakup@Cars24.com.

13. INTERPRETATION

If discrepancies exist between this policy and applicable laws, the laws will take precedence.

Edits and version history Annexure:

CSPL:

| Version | Enforcement Date | Proposed By | Reviewed by | Approved By |
|----------------|-------------------------|-----------------------------|-------------------------------|-----------------------------|
| 9 | 8 July 24 | Pranati Tandon- Sr. Manager | Kamal Avutapalli - Legal Head | Nitin Khera - Director - HR |

CFSPL:

| Version | Enforcement Date | Proposed By | Reviewed by | Approved By |
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| 8 | 8 Aug 24 | Pranati Tandon- Sr. Manager | Kamal Avutapalli - Legal Head | Nitin Khera - Director - HR |

Consolidated Revised Version

| Version | Enforcement Date | Proposed By | Reviewed by | Approved By |
|----------------|-------------------------|--|--|---|
| 1 | 19 Dec 24 | Apoorv Gupta- Sr. GM, Founder's Office | Pranati Tandon- Sr. Manager | Board of Directors |
| 2 | 01 May 25 | Pranati Tandon- Sr. Manager | Apoorv Gupta- Sr. GM, Founder's Office | Nitin Khera - Director - HR |
| 3 | 27 May 25 | Pranati Tandon- Sr. Manager | Apoorv Gupta- Sr. GM, Founder's Office | Nitin Khera - Director - HR |
| 4 | 09 Sept 25 | Danish Iqbal - Assistant General Manager | Apoorv Gupta- Sr. GM, Founder's Office | Mira Shaw Aditya - Associate Director |
| 5 | 08 Jan 26 | Shivani Deshmukh - Assistant General Manager | Apoorv Gupta- Sr. GM, Founder's Office | Mira Shaw Aditya - Associate Director |
| 6 | 12 Mar 26 | Snigdha Arora - Assistant General Manager | Ayushi Aman - Sr. GM, Founder's Office | Sahil Bhatia - Associate Vice President |

