



R R KABEL LIMITED

Prevention of Sexual Harassment (POSH) Policy

1. Title

This policy shall be called the 'Anti Sexual Harassment Policy' ("**Policy**").

2. Commencement

This Policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, secondees and applies to any alleged act of sexual harassment against persons at workplace,

3. Purpose

3.1 R R Kabel Limited (the "Company") is an equal employment opportunity company and is committed to creating a healthy working environment that enables Employees (as defined below) to work without fear of prejudice, gender bias and sexual harassment. Further, the purpose provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it in accordance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 along with all amendments from time to time ("the Law"). The Company also believes that all Employees (as defined below) of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving employees is a grave offence and is therefore punishable.

3.2 The supreme court of India has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

4. Definitions

4.1 "**Board**" means the Board of directors of the Company.

4.2 “Company” means R R Kabel Limited

4.3 “Employee” means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a 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.

4.4 Aggrieved Person/ Complainant: Anyone, of any age or gender whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. In case, anyone else has to file a complaint on behalf of the Aggrieved Person as per Law, such person shall be referred to as the “Complainant.” Any reference to the term ‘Complainant’ throughout this Policy shall mean reference to ‘Aggrieved Person’ and / or the ‘Complainant’ as applicable.

4.4.1 If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:

- a) their relative or friend; or
- b) their co-worker; or
- c) an officer of the National Commission for Women or State Women’s Commission; or
- d) any person who has knowledge of the incident

4.4.2 If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- a) their relative or friend; or
- b) a special educator; or
- c) a qualified psychiatrist or psychologist; or
- d) the guardian or authority under whose care they are receiving treatment or care; or
- e) any person who has knowledge of the incident jointly with the Aggrieved Person’s relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

4.4.3 If the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

- 4.5 Respondent:** The person (i.e. the Employee of the Organization as defined above) against whom the complaint of sexual harassment has been filed.
- 4.6 “Bhartiya Nyay Sanhita”** means the Bhartiya Nyay Sanhita erstwhile referred to as Indian Penal Code, 1860, as amended.
- 4.7 “Internal Committee”** means and include an Internal Committee (hereinafter referred to as the “Committee” or “IC”).
- 4.8 “Member”** means a member of the Internal Committee.
- 4.9 “Parties”** means collectively the complainant and the respondent.
- 4.10 “Policy or “This Policy”** means, the Anti Sexual Harassment Policy.
- 4.11 “Presiding Officer”** means the presiding officer of the Committee and shall be a woman employed at a senior level at the Workplace amongst the Employees.
- 4.12 “Workplace”** shall mean all places where Organization’s work is carried out. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually.

For example:

- a. All offices or other premises where Organization’s business is conducted.
- b. All Organization related activities performed at any physical or virtual site.
- c. Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations.

- d. Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, etc.
- e. Any sexual harassment on any social networking website during or outside of office hours.
- f. Any place visited by Employee or arising out of or during the course of employment with Organization, including transport services provided by Organization for undertaking such journey.

5 Scope

A. Sexual harassment shall mean and include any of the following:

- a. unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- b. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her / his performance;
- c. eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- d. act or conduct by a person in authority which creates the environment at Workplace hostile or intimidating to a person belonging to the other sex;
- e. conduct of such an act at Workplace or outside in relation to an Employee of the Company, or vice versa during the course of employment; or
- f. any unwelcome gesture by an Employee having sexual overtones.

B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behaviour of sexual nature which may amount to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment; or
- b. Implied or explicit threat of detrimental treatment in employment; or

- c. Implied or explicit threat about the present or future employment status;
or
- d. Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
- e. Humiliating treatment affecting any person's health or safety.

6. Complaint Redressal Committee- Internal Committee

6.1 A Committee has been constituted by the Board to consider and redress complaints of sexual harassment.

At all times, the IC shall comprise of the following:

- i. A senior level woman Employee shall be appointed as Presiding Officer of the IC ("Presiding Officer"). The Presiding Officer shall automatically vacate her office upon ceasing to be Employee of Organization.
- ii. Minimum two (2) members of the IC will be appointed from amongst Employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field. These members shall automatically vacate office upon ceasing to be Employee of Organization.
- iii. Minimum one (1) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment. This member shall vacate office upon termination of contract with Organization.

At least one-half of the total members nominated to the IC shall be women.

- 6.2** A quorum of three Members is required to be present for the proceedings to take place. The quorum shall include the presiding officer, at least two Members, one of whom shall be a lady.

7.Redressal Process

- 7.1** Any Employee who feels and is being sexually harassed directly or indirectly may submit a complaint on poshsupport@rrglobal.com of the alleged incident to any member of the Committee in writing with their signature within three months of occurrence of incident. The names and details of the Members are available on the HRMS portal. The Human Resources department also has the IC details, and they can be contacted for further information.
- 7.2** Upon the written request of the Complainant, the IC may attempt to resolve the matter through conciliation before initiating an inquiry. In case a settlement is arrived at, the IC will record & report the same to the management for taking appropriate action. The IC will also provide copies of the settlement to both Parties. If conciliation has been reached and the action is implemented, the IC will not be required to conduct any further inquiry. Monetary settlement cannot be made during such conciliation.
- 7.3** The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, except to use the same for discreet inquiry.
- 7.4** The Committee will hold a meeting with the complainant within seven days of the receipt of the complaint, but no later than 10 days in any case.
- 7.5** At the first meeting, the Committee Members shall hear the complainant and record their allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate their complaint.
- 7.6** Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to them to give an explanation, where after, an inquiry shall be conducted and concluded.

- 7.7** In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
- 7.8** In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Board.

8 Inquiry Process

- 8.1** On receipt of the complaint, the IC shall send copy of the complaint received from the Complainant to the Respondent within a period of 7 (seven) working days. If the complaint has been received on email, the IC member shall forward the same to the Respondent, with clear instructions that the same is not to be shared with anyone and strict confidentiality has to be maintained.
- 8.2** The Respondent shall file the reply to the complaint along with list of documents, and names and addresses of witnesses (if any), within a period of **10 (ten) working days** from the date of receipt of the documents.
- 8.3** If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to IC the names of witness/es whom they propose to call.
- 8.4** If the Complainant desires to tender any documents by way of evidence before IC, they shall supply copies of such documents. Similarly, if Respondent desires to tender any documents in evidence before IC they shall supply copies of such documents. Both shall affix their signature on the respective documents to certify these to be authentic documents.
- 8.5** If the complainant desires to tender any documents by way of evidence before the Committee, they shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee, he / she shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.

- 8.6** The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be necessary for the inquiry process. Any refusal by any Employee of Organization to attend any hearing before the IC when summoned or to provide to the IC, any documents and / or information within their power or possession shall constitute as misconduct, rendering such Employee for adverse action by Organization.
- 8.7** The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for 3 (three) consecutive hearings convened by the Presiding Officer. Such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the Complainant or Respondent as the case maybe.
- 8.8** In conducting the inquiry, at any point of time, the Complaint shall be heard by a minimum of 3 (three) members including the Presiding Officer and the External Member and IC shall complete the inquiry within reasonable period but not beyond 90 (ninety) days.
- 8.9** IC shall notify in writing, the time and dates of its meetings to the Complainant, the Respondent and witnesses.
- 8.10** All inquiry proceedings will be documented in detail and treated as strictly confidential with restricted viewing only on need to know basis.
- 8.11** Inquiry proceedings shall be minute / recorded in writing. They may be audio recorded as well (where possible). The minutes / transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC in token of authenticity thereof.
- 8.12** All colleagues and witnesses who are part of the IC proceedings will need to sign a confidentiality declaration.

8.13 The Complainant and Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.

9. Other Points

9.1 The Committee may recommend to the *Chief Human Resource Officer (CHRO)* to transfer or any of the other appropriate disciplinary action.

9.2 The Board shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.

9.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

9.4 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to management.

9.5 In the event the Committee finds the degree of offence coverable under the *Bhartiya Nyay Sanhita* then this fact shall be mentioned in its report and appropriate action shall be initiated by the Board for making a police complaint.

9.6 The Company shall also ensure inclusion of a statement in the Report by its Board stating that the Company has complied with the provisions relating to the constitution of the Committee under the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*.

10. Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer any action including but not limited to :

- a) Transfer the aggrieved individual or the respondent to any other workplace;
or
- b) Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- c) Grant such other relief to the aggrieved individual as may found to be appropriate; or

- d) Restraint the respondent from reporting on the work performance of the complainant.

11. Recommendation Of IC:

Where the Committee arrives at the conclusion that the allegation against the Respondent has been proved, where Respondent is an Employee it will recommend to the Company:

1. To take action for sexual harassment as a misconduct as per Organization Policy.
2. To take action as per the service rules applicable to the Respondent and where no service rules are applicable to take any action including:
 - A written apology from the Respondent
 - A letter of warning may be given to the Respondent that will be placed in the personnel file
 - Reprimand or censure the Respondent
 - Withholding the promotion or reduction in rank
 - Withholding of pay rise or increments
 - Immediate transfer or suspension without pay
 - Termination from service / dismissal from the services of Organization
 - Undergoing a counselling session
 - Carrying out community service
 - deduction from salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs. In case, Organization is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

12. Malicious Complaint

- 12.1** If on inquiry, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the Respondent / tarnishing their image in Organization or otherwise and/or to settle personal / professional scores, strict action will be recommended by IC against the Complainant. Hence, in case IC arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced a

forged or misleading document, IC may recommend to Organization to take an action applicable to Respondent if the complaint was genuine. In this regard, IC may recommend any of the actions specified above (As applicable).

12.2 A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as the malicious intent on the part of the Complainant will have to be established through the inquiry process before an action against such Complainant is recommended.

13. Confidentiality

This Policy and the law prohibit any person including Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the Committee during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action.

14. Protection to Complainant

The Company is committed to ensuring that no Employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue and / or produces any forged or misleading document) will be subject to applicable disciplinary action.

15. Appeal

Aggrieved Person is a Woman:

If the aggrieved person is a woman, either the Respondent or the aggrieved woman can appeal the Committee's recommendations under the relevant laws and rules as maybe notified from time to time within 90 days a.

Aggrieved Person is Any Other Gender (not a Woman):

If the aggrieved person is not a woman, either the Complainant/Aggrieved Individual or the Respondent can appeal the Committee's recommendations or its non-implementation by contacting CHRO within 90 days, who will review the appeal.

16. Filing of Complaint with Police

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. Organization will provide assistance in this regard, if assistance is sought. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant.

17. Amendments

This Policy shall be reviewed periodically by the Board or any other person authorized by the Board and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. However, all such amendments are subject to applicable laws, rules and regulations to the Company, from time to time.
