



*POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN
ROYAL INDIA CORPORATION LIMITED.*

INTRODUCTION:

As a Company, we are committed to conducting and governing ourselves with ethics transparency and accountability and to this, we have developed governance structures , practices and procedures that ensure that ethical conduct at all levels is promoted across our value chains. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company.

ROYAL INDIA CORPORATION LIMITED (“RICL”) is committed to providing a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of women and men at work.

The Company will not tolerate any form of sexual harassment and is committed to take necessary steps to ensure that its employees are not subjected to any form of harassment.

APPLICABILITY:

This policy applies to all the employees, workers and trainees (whether in the office premises or outside while on assignment) of “RICL”. Where sexual harassment occurs to a RICL employee as a result of an act by a third party or outsider while on an official duty, RICL will take on necessary and reasonable steps to assist the affected person in terms of support and preventive action.

MEANING OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.



Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical),
2. Demand or request for sexual favours,
3. Any other type of sexually-oriented conduct,
4. Verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

INTERNAL COMPLAINT COMMITTEE (ICC):

The ICC has been constituted by the Company to consider and redress complaints of Sexual Harassment from all the workplaces of the Company. The Chairman and Members of ICC are as follows:

Ms. Manisha Anand Chairperson & Independent Director

Mr. Ritesh Khemsara Member & HR

Ms. Siddhi Patil Member

Guidelines for the formation of ICC are given below:

1. At least 50% of the members of the ICC should be women.
2. The Chairperson of the ICC should be a women employed at a senior level at the workplace.
3. Not less than two members from amongst Employees preferably committed to the cause of women or who have had experience in social work or legal knowledge.
4. One member from NGO/Associations committed to the cause of women and familiar with the issues related to Sexual Harrassment. She/he should be paid fees/allowances as decided by the Company for holding the proceedings of ICC.
5. A quorum of three Members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom should be lady.
6. The presiding officer and every member of the ICC shall hold office for such period, not exceeding three years from the date of nomination of the relevant member/presiding officer of the Company.



REDRESSAL PROCESS:

1. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
2. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
3. The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
4. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
5. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
6. 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. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

ENQUIRY PROCESS:

1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
2. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.



4. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
5. If the Complainant desires to tender any documents by way of evidence before the Committee, she / he 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 his / her signature on the respective documents to certify these to be original copies.
6. The Committee shall call upon all witnesses mentioned by both the parties.
7. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

COMPLAINTS MADE WITH A MALICIOUS INTENT:

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.



Victim makes a formal complaint to the Complaint committee

Complaints committee examine the allegation

If the allegation does not fall under the purview of sexual harassment or the allegation does not constitute an offence of sexual harassment, the concern will be dismissed and communication will be sent to the victim.

Process ends

If the allegation falls under the purview of sexual harassment, the committee initiates the enquiry.

Committee conducts a detailed enquiry with the accused & other individuals.

Complaints committee submits its report to the competent authority preferably within 90 days of receipt of complaint.

No

YES

Accused is exonerated

Concern proved?

Disciplinary action is taken against the accused including preventive

Disciplinary action shall be taken against the complainant, if deemed fit.