

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

1. PURPOSE:

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. Establish guidelines as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

2. SCOPE:

RNFI SERVICES LIMITED aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in RNFI SERVICES LIMITED towards any other person being an employee of RNFI SERVICES LIMITED, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

3. APPLICABILITY:

All employees of RNFI SERVICES LIMITED.

4. DEFINITION:

- I. **Employee of RNFI SERVICES LIMITED**– Includes person carrying out any work on behalf of RNFI SERVICES LIMITED and may have been hired as Permanent, Temporary, Contracted or on Retainer Ship Basis, part-time basis etc., either directly or indirectly or through vendor organization.
- II. **Sexual Harassment** – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in a manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .
- III. **Aggrieved Women** - In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- IV. **Respondent:** Employees against whom the complaint has been filed.
- V. **Workplace:** In addition to the place of work [Head office / Branch offices] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with RNFI Services Limited, including transportation provided for undertaking such a journey.
- VI. **Employer:** A person responsible for management, supervision and control of the workplace .

5. POLICY GUIDELINES:

Sexual Harassment shall include but not limit to: -

- Physical Contact & Sexual advances
- Demand or request for sexual favors;
- Sexually- colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

6. Roles & Responsibilities

1. Responsibilities of Individual: It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a. Refusing to participate in any activity which constitutes harassment
- b. Supporting the person to reject unwelcome behavior
- c. Acting as a witness if the person being harassed decides to lodge a complaint

All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

2. Responsibilities of Managers: All managers at RNFI Services Limited must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way .

7. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

A complaint shall be submitted through email to hr.operations@rnfi.co.in or can be discussed during the meeting with any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

8. INTERNAL COMMITTEE:

- a. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:

- Presiding Officer - 1 member
- Internal Member - 3 members
- External Member - 1 member (NGO / Legal expert)
- At least one half of the total members is women

- b. The committee is responsible for:

Receiving complaints of sexual harassment at the workplace

- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action

- Maintaining strict confidentiality throughout the process as per established guidelines
 - Submitting annual reports in the prescribed format
- c. Within 3 working days, the internal committee shall commence Official Internal Enquiry by:
- informing the said complaint to the respondent.
 - instructing to stop the alleged act of Sexual Harassment immediately
 - informing not to reach out to the complainant directly or indirectly
 - asking an immediate explanation from him/her to the same
- d. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by RNFI SERVICES LIMITED in order to stop the alleged act(s)
- e. Within 15 days from receipt of the complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s)
- f. A complaint will be closed no later than one month from receipt of complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.
- g. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.

- h. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

9. INQUIRY PROCEDURE :

All proceedings of the inquiry is documented. The Committee interviews the respondent separately and impartially. Committee states exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings are prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent are also interviewed & statements are taken. If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party. Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties.

10. Considerations while preparing inquiry report

While preparing the findings/recommendations, following are considered:

- Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature
- Whether the allegations or events follow logically and reasonably from the evidence
- Credibility of complainant, respondent, witnesses and evidence
- Other similar facts, evidence, for e.g. if there have been any previous accounts of harassment pertaining to the respondent
- Both parties have been given an opportunity of being heard
- A copy of the proceedings were made available to both parties enabling them to make representation against the findings .

A copy of the final findings is shared with the complainant and the respondent to give them an opportunity to make a representation on the findings to the committee

11. Action to be taken after inquiry

Post the inquiry the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

The findings and recommendations are reached from the facts established and is recorded accurately.

If the situation so requires, or upon request of the complainant, respondent or witness, Management at RNFI Services Limited may decide to take interim measures such as transfer, changing of shift etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

12. Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within

the company.

13. Complaint substantiated

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counseling
- ii. Censure or reprimand
- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination
- viii. Or any other action that the Management may deem fit.

14. MALICIOUS ALLEGATIONS :

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint. The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

15. REDRESSAL:

- a. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- b. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- c. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.
- d. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
- e. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
 - Warning
 - Written apology from offender,

- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

16. CONFIDENTIALITY :

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act. Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding SexualHarassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

MONITORING AND REVIEW

This Policy and Procedure will be reviewed whenever required from the date of implementation. Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this Policy, these will be reflected with immediate effect and communicated through HR.