



## **Prevention of Sexual Harassment (PoSH) Policy**

*(Approved and Adopted in the Board Meeting dated 25th April 2024)*

### **1. PREAMBLE**

Rajdhani Flour Mills Limited (hereinafter referred to as 'RFML'/Company) is an organization, which believes and strives to provide a safe and secure environment to its employees to work, free from gender bias or Sexual Harassment. It provides equal opportunity to all its employees and does not discriminate against any of its Employees on the ground of religion, race, caste, sex, place of birth or any of them. Every Employee is treated equally and with dignity and respect.

The Company believes that Sexual Harassment at the workplace or any place other than work place, if committed by an Employee or Employees is a grave offence and is punishable as per the laws of the land.

The right of women to protection against Sexual Harassment and the right to work with dignity are universally recognized human rights and the Government of India ratified this right to women by enacting the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and Rules. This Act aims to provide protection against Sexual Harassment of women at workplace and for prevention and redressal of complaints of Sexual Harassment and for matters connected therewith or incidental thereto.

The Company expects that its Employees treat each other, particularly female Employees, as also clients, whether on-site or otherwise, and other stakeholders with dignity and respect, irrespective of religion, race, caste, sex, financial status or hierarchy. It is with this objective of creating an environment free from discrimination and violence against women, that this Policy has been created.

This Policy has been prepared as per the statutory requirement as well as the policies of the Company.

### **2. OBJECTIVE**

To fulfil the statutory requirement and to prohibit, prevent and redress any act of gender bias or Sexual Harassment, to its female Employees.

To ensure a safe and secure environment to work for the female Employees.

To create awareness of the laws on Sexual Harassment and penalties thereto among managers, trainees, apprentices, contract worker or other Employees called by any other name and deter any act of Sexual Harassment against female Employees.

To implement the Policy, in letter and spirit, and to provide a sense of security to the female Employees.

To uphold the commitment of the Company to provide an environment conducive to working of female Employees.

### 3. SCOPE

3.1. This Policy is applicable to the Directors as well as the Employees of the Company. It is deemed to be a part of the service conditions of the Employees. However, local laws will take precedence, in case of reporting of any case of Sexual Harassment by its Employees in geographical locations other than India.

3.2. The rules and procedures of the Policy shall be applicable to all complaints of Sexual Harassment made by a female Employee of the Company against a male Employee or Employees, provided the act of harassment has taken place at the work place in the course of performing official duties.

### 4. DEFINITIONS

4.1. 'Aggrieved woman' means, in relation to the 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.

4.2. '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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

4.3. 'Sexual Harassment' includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication –

4.3.1. Physical contact and advances;

4.3.2. A demand or request for sexual favours;

4.3.3. Making sexually suggestive remarks about women;

4.3.4. Making sexually coloured remarks;

4.3.5. Showing pornography in the workplace;

4.3.6. Any other unwelcome physical conduct such as physical contact, advances or molestation, stalking, verbal or non-verbal conduct such as jokes, letters, phone calls, texts, messages through apps, social networking sites, e-mails, display of pictures, signs with sexual connotation, etc.

Further, following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment –

4.3.7. Implied or explicit promise of preferential treatment in her employment;

4.3.8. Implied or explicit threat of detrimental treatment in her employment;

4.3.9. Implied or explicit threat about her present or future employment status;

4.3.10. Interference with her work or creating an intimidating or offensive or hostile work environment for her;

4.3.11. Humiliating likely to affect her health or safety.

4.4. 'Workplace' includes

4.4.1. any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled by the Company;

4.4.2. any place visited by the Employee arising out of or during the course of employment including a visit to the office of the client, official events, transportation provided by the employer for undertaking such a journey.

## 5. INTERNAL COMPLAINTS COMMITTEE

5.1. A committee to be known as "Internal Complaints Committee" or "Committee" shall be constituted by the Company to consider and redress complaints of Sexual Harassment.

5.2. The Company shall nominate a senior level woman Employee as the presiding officer.

5.3. A minimum of two members from amongst the Employees and a nominee from a non-government organisation or any association committed to the cause of women or a person familiar with the issues relating to Sexual Harassment shall also be nominated by the Company to act as members of the Committee.

5.4. The members of the Committee so currently nominated are:

5.4.1. Mrs. Swati Jain- Presiding Officer

5.4.2. Mr. B.K. Jha- Member

5.4.3. Mr. Arvind Gupta– Member

5.4.4. Mrs. Poonam Gupta- External Member

5.5. The Presiding Officer and every member of the Committee shall hold office for a period of 3 years from the date of nomination.

5.6. A quorum of three (3) members of the Committee is required to be present to conduct the proceedings. The quorum shall include the Presiding Officer and two (2) other members.

5.7. No person who is a complainant, witness, or defendant in the complaint of Sexual Harassment shall be a member of the Committee.

5.8. Any member charged with Sexual Harassment in a written complaint must step down as a member of the Committee during the enquiry.

## 6. REPORTING OF COMPLAINTS OF SEXUAL HARASSMENT

Any Aggrieved woman/complainant may make a complaint of an alleged Sexual Harassment at workplace to the

Committee, whether direct (email to [info@rajdhanibesan.com](mailto:info@rajdhanibesan.com)) or indirect, in writing, within a period of three (3) months from the date of incident.

6.1. However, where such complaint cannot be made in writing, any member of the Committee, as the case may be, shall render all reasonable assistance to the individual concerned for reducing the complaint in writing.

6.2. The complaint may also be made by the legal heir or such other person, in case the Aggrieved woman/complainant is unable to make a complaint on account of her mental or physical incapacity or death or otherwise.

6.3. The complaint must state the following details, along with the supporting documents, in original:

6.3.1. A detailed description of the alleged incident in question along with the name of the victim and the perpetrator/respondent, date and location of the incident, the department in which the Aggrieved woman works, etc.;

6.3.2. Shall be signed by the Aggrieved woman;

6.3.3. Shall contain the contact details of the Aggrieved woman;

6.3.4. Names and addresses of witnesses;

6.4. 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. It shall take all steps to protect the privacy of the individual making the complaint and the witnesses.

6.5. The Company shall maintain a record of all the documents/proof submitted by the Aggrieved woman or the perpetrator/respondent.

## 7. CONCILIATION

The Committee may, before initiating the enquiry and at the specific request of the Aggrieved woman, take steps to settle the matter between her and the respondent through conciliation.

## 8. INQUIRY PROCESS

8.1. The Committee, upon receipt of the complaint, shall send a copy of the complaint to the perpetrator/respondent, within a period of seven (7) working days.

8.2. The respondent shall file his reply along with his list of documents, names and addresses of witnesses within a period of ten (10) working days from the date of receipt of the complaint.

8.3. The Committee shall make inquiries into the complaint in accordance with the principles of natural justice.

8.4. The venue of the proceedings will be decided by the Committee keeping in mind the convenience and security of the Aggrieved woman/complainant.

8.5. The Committee may, on a written request made by the complainant, recommend to transfer the complainant or respondent to any other work place, or grant leave to the complainant up to a period of three (3) months. Such leave shall be in addition to the leave otherwise entitled to.

8.6. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the enquiry proceedings.

8.7. The parties shall, during the course of inquiry, be given a reasonable opportunity of being heard and a copy of the findings shall be made available to both the parties to enable them to make representation against the findings before the Committee.

8.8. If the complainant or the respondent desires any witness to be called, they shall communicate in writing to the Committee the names of witnesses that they propose to call. The responsibility of communicating with the witnesses lies with the complainant/defendant regarding the date, time and venue of the meeting.

8.9. The Committee shall have the right to terminate the enquiry proceedings or give an ex-parte decision, if the complainant or respondent fails, without sufficient cause, to present himself/herself for three (3) consecutive hearings convened by the Presiding Officer.

8.10. The inquiry shall be completed within a maximum period of ninety (90) days.

## 9. INQUIRY REPORT

9.1. The Committee shall submit a report of the findings to the Company within a period of ten (10) days from the date of the completion of the inquiry. A copy of the report shall also be provided to the Parties.

9.2. Where the Committee arrives at a conclusion that the allegations against the respondent has not been proved, it shall recommend to the Company that no action is required.

9.3. Where an incident of Sexual Harassment has been determined by the Committee, corrective/disciplinary action based on the gravity of the offence may be recommended to the Management of the Company.

9.4. Corrective action may include any of the following:

9.4.1. Mandating the respondent to issue a formal apology;

9.4.2. Requiring the respondent to participate in counseling;

9.4.3. Written warning to the respondent and a copy of it maintained in the Employee's file;

9.4.4. Change of work assignment / transfer for either the complainant or the respondent;

9.4.5. Demotion of the respondent's position;

9.4.6. Deduction from the salary of the respondent, such sum, as the Committee may consider appropriate to be paid to the complainant; or

9.4.7. Suspension or termination of the services of the Employee found guilty of the offence.

9.5. Where the Committee arrives at a conclusion that the complaint was made with malicious intent or the complainant/respondent has produced a forged or misleading document, it may recommend to the Company to take action against such party, as per the terms of their employment agreement and any applicable law.

9.6. The Company shall act upon the recommendation within sixty (60) days of receipt of the report.

9.7. The complainant and the respondent shall have the right to appeal if they are dissatisfied with the decision of the Committee before the appropriate Court, within a period of ninety (90) days of the recommendation made by the Committee.

### ANNUAL REPORT

The Committee shall prepare an annual report for each financial year and submit the same to the

Company. The report shall contain –

Number of complaints of Sexual Harassment received in a year

Number of complaints disposed of during the year

Number of cases pending for more than ninety (90) days

Number of workshops or awareness program against Sexual Harassment carried out

Nature of action taken by the Company

