

# **ANTI-SEXUAL HARASSMENT POLICY**

**(Amended and approved by the Board of Directors on September 05, 2024)**

## **COMMITMENT**

Rathi Industries Limited ('the Company' or 'RIL') is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment.

At RIL, we respect dignity of everyone involved in our workplace, whether they are employees or our clients. Any form of sexual harassment is not tolerated in RIL and RIL is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment whatsoever.

## **SCOPE**

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at the workplace and at client sites. The Company will also not tolerate sexual harassment, if engaged in by clients or any other business associates.

The workplace includes:

- i. All offices or other premises where the Company's business is conducted.
- ii. All sites at which company-related activities are performed (even away from the Company's premises).
- iii. Any social, business or other functions where the sexually-oriented conduct or sexual comments may have an adverse impact on the workplace or workplace relations.

## **DEFINITION OF SEXUAL HARASSMENT**

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, sexual comments, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- i. Unwelcome sexual advances (verbal, written or physical);
- ii. Demand or request for sexual favours;
- iii. Any other type of sexually-oriented conduct;
- iv. Verbal abuse or 'joking' that is sex-oriented;
- v. Any conduct (sexually oriented) that has the purpose or the effect of interfering with an individual's work performance (directly or indirectly) 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 (including appraisal decisions).

## **RESPONSIBILITIES REGARDING SEXUAL HARASSMENT**

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment. We require all

employees to make sure that they maintain mutual respect and positive regard towards one another.

### **COMPLAINT MECHANISM**

Since, there are no women employees in the company, Constitution of Internal Complaints Committee is not feasible. However, the company is committed to providing equal opportunities without regard to their caste, sex, religion, color, disability etc.

### **PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT**

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

#### **Informal Resolution Options**

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

Corrective action may include any of the following:

- a) Formal apology;
- b) Counselling;
- c) Written warning to the perpetrator and a copy of it maintained in the
- d) employee's file;
- e) Change of work assignment/ transfer for either the perpetrator or the
- f) victim;
- g) Suspension or termination of services of the employee found guilty of the
- h) offence;
- i) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

### **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 and confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

### **PROTECTION TO COMPLAINANT/VICTIM**

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 strict 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) will be subject to strict disciplinary action.

## **CONCLUSION**

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with absolute dignity and respect.

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