

Renold Chain India Private Limited

Policy on Prevention of Sexual Harassment (POSH) at Work place

I. Introduction

Renold Chain India Private Limited (herein after referred to as “company”) is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involved by employee or employees is a grave offence and is therefore, punishable under the eyes of law.

At Renold Chain India Private Limited, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to

1. Treat each other with dignity and respect
2. Follow the letter and spirit of law
3. Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
4. Refrain from creating hostile atmosphere at workplace via sexual harassment
5. Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by complaint handling procedure of the Company.

Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” of India (hereinafter referred to as the “Act”) and existing rules framed thereunder namely the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the “Rules”)

This policy intends to provide protection against the sexual harassment at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

II. Purpose and Scope

Purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. 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, whether the incident has occurred during or beyond office hours. This policy does not prevent any aggrieved person from taking recourse to the law of the land.

III. Definitions

1. **"Aggrieved Person"** means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitor.
2. **"Complainant"** is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.
3. **"Employee"** as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who 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. **"Respondent"** means a person against whom a complaint of alleging sexual harassment has been made under this policy.
5. **"Committee"** means and include an Internal Complaints Committee.
6. **"Sexual Harassment"** includes any one or more of the following unwelcome acts of behaviour (whether directly or by implication):
 - a) any unwelcome sexually determined behaviour (direct or implied) such as
 - i. physical conduct and advances;
 - ii. unwelcome communications or invitations;
 - iii. demand or request for sexual favours;
 - iv. sexually cultured remarks;
 - v. showing pornography, creating a hostile work environment;
 - vi. any other unwelcome "sexually determined behaviour" (physical, verbal or non-verbal conduct) of a sexual nature.
 - b) The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:
 - i. Implied or explicit promise of preferential treatment in employment;
 - ii. Implied or explicit threat of detrimental treatment in employment;
 - iii. Implied or explicit threat about the present or future employment status;
 - iv. Interference with the person's work or creating an intimidating or offensive or hostile work environment;
 - v. Humiliating treatment likely to affect her health or safety
 - c) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
 - d) Non Verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

III. Composition of Internal Complaints Committee

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Complaints Committee" is constituted. The details of the committee is notified to all covered persons at the location (workplace).

The **Committee** comprises of:

- i. Presiding Officer - A woman employed at a senior level in the organization or workplace
- ii. At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- iii. One external member, familiar with the issues relating to sexual harassment
- iv. At least one half of the total members is women

The **Committee** is responsible for:

- i. Receiving complaints of sexual harassment at the workplace
- ii. Initiating and conducting inquiry as per the established procedure
- iii. Submitting findings and recommendations of inquiries
- iv. Coordinating with the employer in implementing appropriate action
- v. Maintaining strict confidentiality throughout the process as per established guidelines
- vi. Submitting annual reports in the prescribed format

Current members of the Committee is given in the Annexure A

A Quorum of three members is required to be present for the proceedings to take place. The quorum must include the Presiding Officer, at least two members (one of whom must be female).

No person who is a complainant, witness or defendant in the complaint of sexual harassment shall be a member of a committee.

Any Committee member charged with sexual harassment in a written complaint must step down as a member during the enquiry into that complaint.

The members of the Internal Complaint Committee will be appointed by the Board of Directors. The Board of Directors has the power to re-constitute the Committee as may be required from time to time, with in the stipulated requirements of the Act.

IV. Lodging of Complaint

1. An Aggrieved person may make a sexual harassment complaint in writing to the HR department within a period of 3 months from the date of incident. However, believes that he/she has been subjected to sexual harassment, then the complaint/grievance should be promptly reported to the Committee through the HR Manager along with any documentary evidence available or names of witnesses.
2. However, the Committee may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further 3 months, if it is satisfied that bonafide circumstances prevented the aggrieved person from filing complaint within the time limit mentioned in point (1). The complaint should clearly mention name and available details of both the aggrieved

person and the respondent. Anonymous or pseudonymous complaints will not be investigated.

3. If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.
 - i. Legal heir or
 - ii. relative or friend or Co-worker or
 - iii. Any person having the knowledge of the incident
4. The HR Department will forward the complaint to the Presiding Officer of the Committee within seven (7) days from the date of receipt of the complaint.
5. The complainant shall submit two copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

V. Redressal Process

Resolution procedure through Conciliation

Once the Complaint is received, before the Committee initiates an inquiry, the complainant may request the Committee to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the Committee shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the Committee.

Resolution through Formal Inquiry

Conducting Inquiry

The committee initiates inquiry in the following cases:

- i. When the aggrieved woman has not requested conciliation
- ii. Conciliation has not resulted in any settlement
- iii. Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent

The Committee proceeds to make an inquiry within 5 (five) working days of its receipt of the original complaint.

Inquiry Process

1. The Committee within 3 (three) working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.
2. The respondent within 7 (Seven) working days of receiving the complaint shall file his/her reply to the complaint along with list of supporting documents, names and addresses of witnesses.

3. The Committee shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the Committee.
4. Committee shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
5. In the event of failure to attend personal hearing before Committee by the complainant or the respondent on three consecutive dates (intimated in advance) fails to attend personal hearing before the committee without sufficient cause, then the Committee shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the Committee shall serve a notice in writing to the parties, 10 (ten) days in advance, before such termination or the ex-parte order is passed.
6. The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
7. The Committee within 7 (Seven) days from the date of completion of inquiry shall provide a report of its findings and recommendation(s) to the company management and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).

Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the company to: -

1. Transfer the aggrieved person or the respondent to any other workplace/ department; or
2. Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
3. Grant such other relief to the aggrieved individual as may found to be appropriate; or
4. Restraint the respondent from reporting on the work performance of the complainant. Once the recommendation of interim relief are implemented, HR Department shall inform the committee regarding the same.

Action to be taken after inquiry

1. 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.
2. 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 but not limited to:
 - i. Counselling
 - 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. any other action that the Management may deem fit
3. 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.

VI. Confidentiality

The Contents of the Complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner. All the Complaints of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the internal committee.

Annexure A

Internal Complaints Committee members comprises of

1. Presiding Officer – Mrs K Maheswari
2. External Member – Female Member from M/s. Penn Trust
3. Member – Mrs A Amudha
4. Member – T Vinothkumar
5. Member – Rakesh Kailash Sharma