



# **RAMKRISHNA FORGINGS LIMITED**

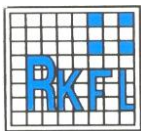
## **POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT THE WORKPLACE**

<b>Name of Policy</b>	<b>Prevention of Sexual Harassment at the Workplace</b>
<b>Implementation date</b>	<b>1 December, 2014</b>
<b>Current Revision date</b>	<b>30 May, 2025</b>
<b>Authority approving the policy</b>	<b>Board of Directors</b>



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## **Introduction:**

Ramkrishna Forgings Limited ('RKFL'/'Company'/'we or 'our' or 'us') is committed to providing a work environment free from sexual harassment and other forms of exploitation or intimidation. The Company shall provide a safe working environment that enables employees to work without fearing discrimination, gender bias, sexual harassment, or any other types of intimidation or exploitation. The Company believes that every employee, regardless of gender, has the right to be treated with respect.

Prevention of Sexual Harassment Policy ('Policy') has been put in place to prohibit, prevent and deter any acts of sexual harassment, and to provide a procedure for dealing with cases of sexual harassment.

## **Objective:**

To lay down procedures for the prevention of sexual harassment at the Workplace, and appropriate remedial action to ensure a safe work environment for women in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (the "Act"). The purpose of this Act is to protect women from sexual harassment at work, to prevent and address complaints of sexual harassment, and to address any issues related to or incidental to those purposes.

## **Scope:**

This Policy applies to:

- All employees, regardless of seniority or contractual status, that is permanent, short-term contract, and casual employees. It also applies to a probationer, apprentice, trainee or called by any other such name.
- All Board members, executive and non-executive.
- All contractors and sub-contractors, vendors, third-party agents, or person having interest in any transaction with the Company.

## **Definitions**

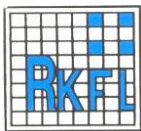
- "Aggrieved Person" means in relation to Ramkrishna Forgings Ltd. or any of its subsidiaries or affiliates, any woman or man, whether an employee or not, alleges to have been subjected to any act of sexual harassment by the Respondent.
- "Internal Committee (IC)" means a committee constituted under Rule V for purposes of prevention, prohibition and redressal of sexual harassment at the workplace in accordance with the provisions of the Act.
- "Respondent" means any person against whom the aggrieved person has made a complaint of sexual harassment under Rule VII



- “Sexual Harassment” includes the undermentioned acts or behaviour whether directly or by implication:
  - Unwelcome sexual advances, requests or demands for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any Company activity.
  - Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals’ sensibilities and affect his/her performance.
  - Making implied or explicit promises of preferential treatment in his/her employment.
  - Implied or explicit threat of detrimental treatment in his/her employment.
  - Implied or explicit threat about his/her present and future employment status.
  - Interference with his/her work or creating an intimidating or offensive or hostile work environment.
  - Humiliating treatment likely to affect health or safety.
  - The behaviour may be any single communication, or a range of communication, which may be verbal, or non-verbal such as touching or patting, or may be communicated by documents, or by telephone, cell phone messages, website communication, or emails.
- “Workplace” includes RKFL premises, including its subsidiaries and affiliates, any other place where RKFL carries out its activities, and any place visited by its employee arising out of or during the course of work/employment including transportation provided by RKFL.

**The content of the behaviour may be:**

- Verbal sexual innuendoes, such as jokes, suggestions, or hints about sexual behaviour, comments about physical appearance, particularly in front of others in a group, and particularly where there is a gender imbalance in the group such as a single woman in a group of men, or Physical contact such as holding onto a hand or arm longer than is necessary, or touching particularly sensitive parts of the body.
- Non-verbal communication such as gestures of a sexual nature, and removal of clothing to display parts of the body (flashing).
- The display, giving or sending of offensive pictures, or verbally offensive material, particularly of a sexual nature.



- Demands or offers, such as for sexual attention, to spend time together, or
- Following, stalking, persistent visiting, telephoning, sending of cell phonemessages, or other invasions of personal privacy.
- The behaviour will be more seriously regarded if it is by a senior person to a junior person, and particularly if it suggests any outcome following the behaviour, such as:
  - Recruitment, promotion, or achieving a privileged position.
  - Positive performance appraisal result, or career advancement.
  - Increased remuneration, bonus, allowances, or
  - Any other form of benefit or enhancement such as travel, particularly overseas, training, conference attendance or entertainment.
- The behaviour may be a single incident or continuous unwelcome behaviour.
- The behaviour will be unwelcome, if the receiver of the behaviour has made it clear that the behaviour is offensive and unwelcome, or the person responsible for the behaviour should have known that the behaviour would be unwelcome or unacceptable, particularly where the receiver of the behaviour is junior and indicating that the behaviour is unwelcome to a senior would be difficult.
- As technology advances, there are increased opportunities for the communication of sexually offensive verbal and visual images; therefore, this Policy anticipates a range of communication, all of which will be regarded as offensive regardless of the format or style of the communication, or whether the technology exists at the time of the publication of this Policy.

### **Raising a Complaint:**

- The aggrieved person should indicate both verbally and non-verbally that the behaviour is considered offensive and unwelcome and specifically request the person responsible to stop the behaviour.
- Where the aggrieved person feels that they cannot do this, or they have done this but the behaviour continues then the aggrieved person may use the formal Grievance Procedure and lodge a complaint in writing (Annexure A).
- Where the aggrieved person cannot lodge the complaint in writing then the Chairperson or any member shall assist the aggrieved person to lodge the complaint in writing.
- Where the aggrieved person could not lodge a complaint on account of the physical or mental incapacity or death or otherwise her legal heir can lodge a complaint.
- The aggrieved person can lodge a complaint by sending an email on [sakti.senapati@ramkrishnaforgings.com](mailto:sakti.senapati@ramkrishnaforgings.com)



### **Internal Committee (IC) Composition:-**

- |   |                     |
|---|---------------------|
| • <b>Ms. Mona Bahadur</b>                   | – Presiding Officer |
| • <b>Ms. Ruma Roy Gupta</b>                 | – Member            |
| • <b>Ms. Sophia Almeida</b>                 | – Member            |
| • <b>Ms. Sushila Kumari</b>                 | – Member            |
| • <b>Mr. Satyaranjan Khatua</b>             | – Male Member       |
| • <b>Mr. Ravi Rajhans</b>                   | – Male Member       |
| • <b>Ms. Sangeeta Jha (Senior Advocate)</b> | – External Member   |

### **Tenure of IC**

- Members of the IC will hold office for a period of 3 years, from the date of their nomination.
- A member of the IC may resign at any time by tendering his or her resignation in writing to the Company.
- The Presiding Officer or any other member of the IC who is an employee shall automatically vacate his or her office upon ceasing to be an employee of the Company or after completion of the stipulated tenure of 3 years.

At least one-half of the members of the IC shall be women, including the Presiding Officer, as prescribed under law. The IC will receive complaints and manage the redressal process for complaints as mentioned below.

### **Redressal of Complaint:**

#### **Conciliation**

The aggrieved person may request the Internal Committee to take steps to resolve the matter through conciliation before the investigation process is initiated. However, no monetary consideration shall be made as the basis for such conciliation. If a settlement has so arrived, the Internal Committee will record the settlement details and send them to the aggrieved person and the respondent. In such cases, no further inquiry shall be conducted by the Internal Committee.

#### **Inquiry**

In case where a settlement is not requested and/or arrived at through conciliation, the Internal Committee will conduct an inquiry based on this Policy. The Internal Committee shall send a copy of the complaint received to the respondent within a period of seven working days of receipt of the complaint. The Respondent shall reply within 10 working days with the list of documents, names and addresses of witnesses. The Internal Committee shall prepare a charge sheet containing specific charges of sexual harassment based upon the complaint and hand over the same to the respondent as well as the aggrieved person.



### **Inquiry report**

The Internal Committee shall complete the inquiry within 90 days and shall forward within 10 days thereafter, a report to the Management with its recommendations. If the allegation has not been proved, the Internal Committee shall recommend that no action is required to be taken in the matter.

### **False or malicious complaints or false evidence**

If the Internal Committee determines that the allegation against the Respondent is malicious, that the Complainant made the complaint knowing it to be false, or that the Complainant produced any forged or deceptive document, it may recommend to the Company that the Complainant who made the complaint subject to appropriate repercussions in accordance with the provisions of the applicable service rules or as required by applicable law.

It is not necessary to take action against the complainant just because they cannot support their claims or offer sufficient evidence. Further, before the Internal Committee recommends to the Company take any action against the Complainant, the inquiry process must establish the Complainant's malicious intent

### **Confidentiality, Record-Keeping and Media Statements:**

- At all stages of the procedures, informal and formal, and from the first discussions when the potential allegations of sexual harassment are discussed, all parties to the discussion are required to be aware of the sensitivity of the matters under discussion, the potential impact on individual lives and careers, and to exercise extreme caution in the disclosure of the information, and where possible to maintain the confidentiality of the receiver and complainant and the person responsible for the behaviour.
- Once the procedures are concluded, the documents should be filed in sealed envelopes marked confidential and lodged with the person responsible for the retention of personnel records.

### **Management Roles and Responsibility:**

- Management has a general responsibility to ensure that all allegations of sexual harassment are handled sensitively, with respect for the dignity of the persons involved.
- Management has an additional duty to ensure a safe and secure workplace, and if there is any indication that there may be a physical threat of danger to any person,



professional advice should be sought from internal persons responsible for safety and security, and where appropriate from external authorities and professional persons.

- Management is responsible for ensuring that the allegations are dealt with timeously, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than in a mechanistic procedural manner.

### **Disciplinary Action:**

- After the complaint has been investigated, Management will decide on disciplinary action:
- Where the behaviour was not intended to offend and is less serious, such as the use of inappropriate words, jokes, simple contact cell phone messages, or invitations, counselling of the person responsible for the behaviour may be appropriate.
- Repeated incidents of less serious behaviour or more serious behaviour may lead to a warning or a final warning.
- Serious incidents of sexual harassment may lead to summary dismissal.
- Where appropriate and where possible with the Company structure and depending upon the nature of the work undertaken by the complainant and the person responsible for the behaviour, sanctions to avoid dismissals such as transfer to a different position or department may be considered. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- The penal consequences of sexual harassment should be displayed on the display board or as posters at a spacious place in the working place.

### **Trainings**

- RKFL employees must participate in POSH training and awareness programs organized by the Company.



## Annexure A

