

RKCPL LIMITED
SEXUAL HARASSMENT POLICY

Private & Confidential

Objective

RKCPL Limited ("RKCPL" or "Company") is committed to creating and maintaining a secure work environment where it's Employees can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. The Board of Directors ("Board") of Company, in its meeting dated 28th of July, 2025 has adopted this Policy on Prevention of Sexual Harassment at Workplace ("the policy"), (hereinafter referred to as "Act") pursuant to the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and The Companies Act, 2013 (as amended), in supersession of all the previous policies of the Company in this regard.

All concerned should take cognizance of the fact that RKCPL strongly opposes sexual harassment, and that such behaviour against women is prohibited by the law as set down in the Act as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action. At RKCPL, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at RKCPL are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. RKCPL will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

Scope

RKCPL's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. RKCPL encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's site offices but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit. RKCPL's Policy against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents,

contractors, customers, vendors, partners and, visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with immediate effect.

Definition

1. "Aggrieved Person/ Complainant" means, a person of any age in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

2. "Company" means RKCPL Limited.

3. "Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

4. "Employer" means in relation to:

a) any department, organization, establishment, institute, office, branch or unit (Subsidiary, step down subsidiary, sister concern etc.) the head of the department, organization, establishment, office, branch or unit, as the case may be;

b) any workplace, any person responsible for the management, supervision and control of the workplace.

For the purposes of this definition, "management" includes the person or board or committee responsible for formulation and administration of policies for such organization and in the present case, would refer to the HR department of the employer.

5. "Internal Complaints Committee" means a committee constituted by Company as per this Policy.

6. "Member" means a Member of the Internal Complaints Committee.

7. "Presiding Officer" means the Presiding Officer of the Internal Complaints Committee.

8. "Respondent" means a person against whom the aggrieved person has made a complaint.

9. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

a) Verbal, non-verbal, or physical conduct such as remarks, phone calls, SMS, MMS or e-mail, gestures, stalking sounds or display of a derogatory nature, physical contact and advances considered unwelcome;

b) Demanding /requesting sexual favors - these include subtle or blatant pressures or requests for any type of sexual favors by an implied or stated promise of preferential treatment or negative consequence concerning an employee's employment status;

c) Making Sexually coloured remarks- - these include verbal abuse or sharing of jokes, verbal or electronic that are of a sexual nature;

d) Showing pornography or other offensive or derogatory pictures, cartoons

e) Representations, graphics, pamphlets or sayings; or

f) Any other unwelcome physical, verbal or non – verbal conduct of sexual nature; or

g) Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

i. Implied or explicit promise of preferential treatment in their employment.

ii. Implied or explicit threat of detrimental treatment in their employment.

iii. Implied or explicit threat about their present or future employment status.

iv. Interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.

v. Humiliating treatment likely to affect the health and safety of the aggrieved person.

vi. In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.

10. "Workplace" includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

Internal Complaints Committee

Every complaint received shall be forwarded to internal complaint committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose. Internal Complaints Committee has been constituted of the following members as nominated by the Company:

1. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
2. Member (Woman Employee)
3. Member
4. One Member associated with an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment.
5. at least one-half of the total Members of committee shall be women.

The Presiding Officer and every member of the ICC shall hold office for a period not exceeding 3 years, from the date of their nomination OR minimum one – third members of the ICC are to be changed or shall be liable for rotation after completion of their Tenure i.e., every 3rd year.

The Presiding Officer and / or any member of the ICC shall be removed or replaced in accordance with the provisions of the Act.

All complaints should be sent to the presiding officer of the ICC. If the complaint is initially sent by e-mail, it may be followed up by a written complaint.

This policy requires complainants to give their names, as anonymous complaints do not hold credibility.

Appropriate measures will be taken to ensure confidentiality. Even investigations will be carried out in a manner conducive to such confidentiality

Procedures for resolution, settlement or prosecution of acts of sexual harassment

Given that this policy highlights a preventive focus, there is a need to distinguish between an

Informal and formal process

Process for Informal Complaint Redressal

- a) Informal processes normally involve an intermediary means for resolving a problem. Under an informal process, an attempt would be made to understand the problem and if by involving an intermediary or through means of conciliation, if a problem could be resolved or counseled, then the said process would be adopted. In the case of a complaint received, the Presiding officer of the ICC shall depute a personnel/officer of the location/Company as the point of first contact for anyone seeking informal support/intervention to stop unwelcome behavior.
- b) Decision as regards adoption/implementation of informal redressal means would depend on a case- to-case basis

Process for Formal Complaint Redressal

1. Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her/him within a period of 3 months from the date of incident and in case of a series of incidents,

within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the Internal Complaints Committee.

2. The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.

3. On receipt of complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Complaints Committee shall follow principle of Natural Justice while handling such complaints. In the event a complaint is made against any member of the ICC; then such members shall cease to be a member of the ICC with immediate effect and a new member may be nominated by the other members of the ICC for dealing with that particular complaint.

Depending on the type and severity of the reported incident as assessed by the ICC and after examining/assessing all information; and after hearing the aggrieved women and the respondent, appropriate decisions will be taken by the ICC whether or not to investigate into the complaint

4. Where the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by-

- A relative or friend; or
- A co-worker; or
- An officer of the National Commission for Women or State Women's Commission; or
- Any person who has knowledge of the incident, with the written consent of the aggrieved person.

5. Where the aggrieved person is unable to make a complaint on account of their mental incapacity, a complaint may be filed by:

- A relative or friend; or
- A special educator' or
- A qualified psychiatrist or psychologist; or
- The guardian or authority under whose care they are receiving treatment or care; or
- Any person who has knowledge of the incident jointly with any of the above.

6. Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.

7. Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

8. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment.

9. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee at Registered Office of the Company at Panchkula. Copy of this email should also be marked to info@rkcp.com so that all Board of Directors are also informed about the Complaint.

10. On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days.

11. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.

12. Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.

13. Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.

14. The Internal Committee must complete its investigation within a period 90 days.

15. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

16. For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the presiding officer.

17. The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:

- Monetary settlement will not be made as a basis of conciliation.
- Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

18. The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:

- Summoning and enforcing the attendance of any person and examining him under oath;

- Requiring discovery and production of documents;
- Any other prescribed matter.

19. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

- To transfer the aggrieved person or the respondent to any other workplace;
- Grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled.
- Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

Protection against retaliation

- 1) No one is expected to retaliate in any way against anyone for complaining under this policy or for cooperating in the investigation, or for having to face the disciplinary action taken by the Company.
- 2) If anyone feels that an aggrieved person is facing retaliation in intimidation/pressure to withdraw the complaint or receiving threats against reporting, testifying or otherwise participating in the investigation, such an aggrieved person may report the matter to any member of the ICC. Immediate steps would be taken by ICC to prevent the same.
- 3) An act of retaliation directly or indirectly is treated as an act of harassment/violation and appropriate disciplinary action shall be taken under this policy.

Confidentiality

- 1) 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.
- 2) It is the duty of all employees and members of ICC to ensure that all complaints and proceedings made under this policy and the information pertaining to it are kept confidential. All incidents/grievances/proceedings reported under this policy shall be treated sensitively and with confidentiality.

Action

1. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:

- Take action for sexual harassment as a misconduct.
- To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
- To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.

4. Such action will be taken within 60 days of the receipt of report.

5. The Management shall implement the decision within 7 days from the date of decision.

6. It will be ensured that victims or witnesses are not victimized or discriminated against. All Employees shall extend fullest co-operation to the ICC and any failure to co-operate, or the giving of wrong or misleading information, or withholding information shall be a violation of this Policy and shall be dealt with appropriately by the Company.

Awareness

1. All the Employees and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.

2. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in RKCPL during their initial Induction.

3. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.

4. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

False Accusations

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.

2. If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee

concludes, that he/she has given false evidence or produced forged or misleading documents.

3. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/ tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against such complainant.

4. The Committee may also take suo-moto action if any incident of harassment is brought to its attention, without any formal complaint being made in this regard.

5. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. RKCPD recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

Duties of employer

- a) The employer shall provide a safe working environment at the workplace with shall include safety from the persons coming into contact at the workplace
- b) The employer shall prominently display this policy at the workplace to create awareness of the rights of Employees;
- c) Prominently display notices in various places spreading awareness about the issue of "Prevention of Sexual Harassment at the Workplace" and giving information for the redressal mechanism that has been put in place and encouraging women to file their grievances.
- d) Organize workshops for employees and members of ICC;
- e) Declare and prominently display the names and contact persons of all the members of ICC;
- f) Widely publicize that the Sexual Harassment is an offence under applicable law;
- g) Treat sexual harassment as misconduct under service rules; 10.8 Monitor timely submission of reports by ICC;
- h) The ICC shall in each calendar year submit an annual report and submit the same to the employer and the Government Officer with the following details:
 - 1) Number of complaints received in the year
 - 2) Number of complaints disposed off during the year
 - 3) Number of cases pending for more than 90 days
 - 4) Number of awareness workshops carried out
 - 5) Nature of action taken by the employer / district officer

Miscellaneous

1. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.

2. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

Breach of policy

Breach of this policy will be treated in conjunction with the Company Code of Conduct.

Appeal

Either the Complainant or the Respondent or both; when aggrieved with the report of the ICC, may appeal the same to the appropriate authority, as specified by law, within a period of ninety days from the receipt of the copy of the Report of ICC and its conclusions to the Respondent and the Aggrieved Person.

Interpretation

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.

Conclusion

1. Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

2. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

3. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.