



WORKPLACE ANTI-HARASSMENT POLICY

RMC SWITCHGEARS LIMITED
[FORMERLY KNOWN AS RMC SWITCH GEARS LIMITED]

WORKPLACE ANTI-HARASSMENT POLICY

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WORKPLACE ANTI-HARASSMENT POLICY

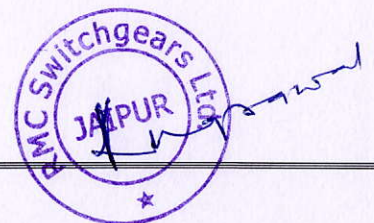
Workplace Anti-Harassment Policy:

The Company is committed to providing a work environment that provides employees equality, respect and dignity. In keeping with this commitment, the Company has adopted a policy of “zero tolerance” with regard to employee harassment. Harassment is defined as unwelcome conduct that is based on race, color, religion, sex (including pregnancy, sexual orientation and gender identity), national origin, age (40 or older), disability or genetic information. Harassment becomes unlawful where:

- (1) enduring the offensive conduct becomes a condition of continued employment; or
- (2) The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but not limited to:

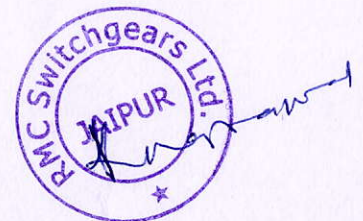
1. Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
 - a. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
 - b. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation
 - c. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will





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- d. Demand or request for sexual favours
 - e. Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body
 - f. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas; Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
 - h. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
 - i. Giving gifts or leaving objects that are sexually suggestive
 - j. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
 - k. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
2. The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:
- a. Implied or explicit promise of preferential treatment in employment;
 - b. Implied or explicit threat of detrimental treatment in employment;
 - c. Implied or explicit threat about the present or future employment status;
 - d. Interference with the person's work or creating an intimidating or offensive or hostile workenvironment; or
 - e. Humiliating treatment likely to affect health or safety.





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This policy applies to all aspects of your employment. Harassment of any other person, including, without limitation, fellow employees, contractors, visitors, clients or customers, whether at work or outside of work, is grounds for immediate termination. The Company will make every reasonable effort to ensure that its entire community is familiar with this policy and that all employees are aware that every complaint received will be promptly, thoroughly and impartially investigated, and resolved appropriately. The Company will not tolerate retaliation against anyone who complains of harassment or who participates in an investigation.

Act of violence/ harassment by or against any of our employees where any work-related duty is performed will be thoroughly investigated and appropriate action will be taken, including involving law enforcement authorities when warranted.

Internal Complaint Committee:

In pursuance of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the Rules framed there under, the Company hereby adopts the procedure for determining complaints filed to the Internal Complaints Committee (ICC) constituted under the Act. The Board of Directors has nominated the following persons as the Presiding Officer and five members of the ICC :-

1. Presiding Officer: Ms. Srishti Kulshrestha (Mob. 9549897421)
2. External Member: Ms. Sanju Balwada (Mob. 7737539313)
3. Member: Mrs. Chitra Chabra (Mob. 9116664799)
4. Member: Ms. Parvati Dhankar (Mob. 8058799831)
5. Member: Mr. Rohit Wadhera (Mob. 9116664793)





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Procedures for Reporting and Investigating Harassment:

Employees should report incidents of inappropriate behavior or sexual harassment as soon as possible after the occurrence. Employees, who believe they have been harassed, regardless of whether the offensive act was committed by a manager, co-worker, vendor, visitor, or client, should promptly notify the Internal Complaint Committee.

The Company takes claims of harassment seriously, no matter how trivial a claim may appear. All complaints of harassment, sexual harassment, or other inappropriate sexual conduct will be promptly, thoroughly and impartially investigated by the Internal Complaint Committee (Harassment Committee).

The Company prohibits retaliation against any employee who files or pursues a harassment claim. To the extent possible, all complaints and related information will remain confidential, except to those individuals who need the information to investigate, educate, or take action in response to the complaint.

All employees are expected to cooperate fully with any ongoing investigation regarding a harassment incident. Employees who believe they have been unjustly charged with harassment can defend themselves verbally & in writing at any stage of the investigation.

To protect the privacy of persons involved, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances. Investigations may include interviews with the parties involved, and, where necessary, individuals who may have observed the alleged conduct or who may have relevant knowledge.





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At the conclusion of a harassment investigation, the complainant and the alleged “harasser” will be informed of the determination. Where appropriate, the “harasser” and the “victim” may be offered mediation or counseling through an employee assistance program (EAP).

Penalties for Violation of Anti-Harassment Policy :

If it is determined that inappropriate conduct has occurred, the Company will act promptly to eliminate the offending conduct, and take such action as is appropriate under the circumstances. Such action may range from counseling to termination of employment, and may include such other forms of disciplinary action (such as, for example, suspension), as the Company deems appropriate under the circumstances and in accordance with applicable law.

If any complainant is found guilty of lodging any false complaint against any person to the ICC, then such complainant shall be penalized and may also be terminated, depending on the nature of false complaint and other circumstances..

As stated above, the Company is committed to the safety & security of our employees. All employees are responsible for helping to create an environment of mutual respect for each other as well as clients & visitors, following all policies, procedures and practices, and for assisting in maintaining a safe and secure work environment.

