



Policy for Prevention of Sexual Harassment at Workplace

1. OVERVIEW

Reliance Jute Mills (International) Limited (hereinafter referred to as the “**Company**”) is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. 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**”).

2. OBJECTIVE

Reliance Jute Mills (International) Limited (“the Company”) is committed to creating and maintaining an atmosphere in which the employees of the Company can work together, without fear of sexual harassment, exploitation or intimidation. 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 has been framed in accordance with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressed) Act, 2013. While the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. 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 and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

3. IMPORTANT DEFINITIONS

- a) “**Aggrieved Individual**” 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 visitors.
- b) “**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.
- c) “**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.
- d) “**Employer**” A person responsible for management, supervision and control of the workplace



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- e) **“Internal Committee”** means and include an Internal Complaints Committee (hereinafter referred to as the **“IC”**).
- f) **“Member”** means a member of the IC.
- g) **“Presiding officer”** means the presiding officer of the IC and shall be a woman employed at a senior level at the workplace amongst the employees.
- h) **“Respondent”** means a person against whom a complaint of alleging sexual harassment has been made under this policy.
- i) **“Parties”** means collectively the complainant and the respondent.
- j) **“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 or pattern of conduct that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely -
 - (i) Physical contact and advances;
 - (ii) Demand or request for sexual favours;
 - (iii) Making sexually coloured remarks or remarks of sexual nature about a person’s clothing or body;
 - (iv) Showing pornography;
 - (v) Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to cat-call, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.Sexual harassment can involve a series of incidents or it can be a one-off occurrence.
 - B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behaviour of sexual harassment may amount to sexual harassment:-
 - Implied or explicit promise of preferential treatment in employment; or
 - Implied or explicit threat of detrimental treatment in employment; or
 - Implied or explicit threat about the present or future employment status; or
 - Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
 - Humiliating treatment affecting any person’s health or safety.
- (k) **“Workplace”** means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

4. PROCEDURES & GUIDELINES

(i) **Composition of Internal Committee**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) has been appointed for all administrative units / offices of the company. The detail of the



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committee is notified to all covered persons at the location (workplace). The committee at each location comprises of:

- (a) Presiding Officer: A woman employed at a senior level in the organization or workplace.
- (b) At least 2 members from amongst employees committed to the cause of women or who have had experience of social work or have legal knowledge.
- (c) One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- (d) At least one half of the total members nominated being women

The committee will be responsible for:

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

Current nominated members of the Committee are given in **Annexure A**.

(ii) Complaint of Sexual Harassment

(a) Raising of complaint

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace.

The complaint must be lodged within **3 months** from the date of incident/ last incident. The Committee can extend the timeline by **another 3 months** for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

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**.

- Legal heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately. Reliance Jute Mills (International)



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Limited [CIN: L17125WB1996PLC081382], Registered Office: 13/C, Kashi Nath Mullick Lane, 1st Floor, Kolkata-700073, (“the Company”).

Wherever possible the Company ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

(b) Receiving the complaint

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:

- ✓ Complaints are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily
- ✓ Situations are not being pre-judged. Written notes are taken while listening to the person. Complainant is allowed to bring another person to the meeting if they wish. When taking accurate notes, complainants own words, where possible, is used. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- ✓ All notes are kept strictly confidential. Complainant’s agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- ✓ The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant’s identity

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent

(iii) Redressal of complain

(a) Conciliation

Before the IC initiates an inquiry, the complainant may request the IC 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 IC 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 IC.

(b) Inquiry

- In case where a settlement is not feasible or could not be arrived at through conciliation (ref clause 4(iii)(a) above), the IC will conduct an inquiry into the complaint. Additionally an inquiry may also be initiated if the aggrieved person informs the IC that any terms of settlement (ref clause 4(iii)(a) above) has not been complied with by the respondent.
- The IC within 7 (seven) working days of receiving the complaint shall



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forward one copy thereof to the respondent for obtaining a response.

- The respondent within 10 (ten) 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.
- The IC 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 IC. IC 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.
- In the event of failure to attend personal hearing before IC by the complainant or the respondent on three consecutive dates (intimated in advance) without sufficient cause, the IC shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party(ies), 15 (fifteen) days in advance, before such termination or the ex-parte order.
- The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
- The IC within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings and recommendation(s) to CPO and Director & General Manager and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).
- Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code 4 (45 of 1860) or under any other law; it shall be the duty of IC to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this Policy.

(c) **Interim relief**

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

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restraint the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, CPO shall inform the committee regarding the same.



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(d) Prohibition of disclosure of information

This policy and the law prohibits any person including IC Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the IC during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action. Further CPO shall impose monetary sanctions as per provisions of the Act and Rules.

(e) Harassment by individuals outside this policy

If an aggrieved individual brings to the notice of the IC any instances of sexual harassment where the respondent is not an employee or other individuals covered under this policy, the Management or any person delegated by the Management shall provide assistance to the aggrieved individual, if such aggrieved individual so chooses, to file a complaint with the IC of the respondent's employer or under the IPC or any other law for the time being in force, as may be appropriate.

(f) Protection to complainant

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 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 and/or produces any forged or misleading document) will be subject to applicable disciplinary action.

(g) Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within **90 days** of the recommendations being communicated.



Internal Complaints Committee of Reliance Jute Mills (International) Limited

Name	:	Designation
	:	Presiding Officer
	:	Member
	:	Member
	:	Member
	:	External Member
	:	Employer



Annexure-2

Sections of the Indian Penal Code (IPC) – Sexual Harassment and Punishment for Sexual Harassment

Under the Indian Penal Code, the newly introduced Section (Section 354A) which deals with Sexual Harassment has made this a ‘cognizable offense’ i.e. a person charged with Sexual Harassment may be arrested **without a warrant**.

- (1) A man committing any of the following acts:
 - (i) physical contact and advances involving unwelcome and explicit sexual overtures; or
 - (ii) a demand or request for sexual favours; or
 - (iii) showing pornography against the will of a woman; or
 - (iv) making sexually coloured remarks, shall be guilty of the offence of sexual harassment.
- (2) Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.
- (3) Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description (i.e. either simple or rigorous) for a term which may extend to one year, or with fine, or with both.

In addition to Section 354A set out above, acts of Sexual Harassment may also constitute other offenses under IPC including Section 354 (assault or criminal force to woman with intent to outrage her modesty), Section 354C (Voyeurism), Section 354D (Stalking), Section 375 and 376 (Rape) and Section 509 (word, gesture or act intended to insult the modesty of a woman) of the IPC.