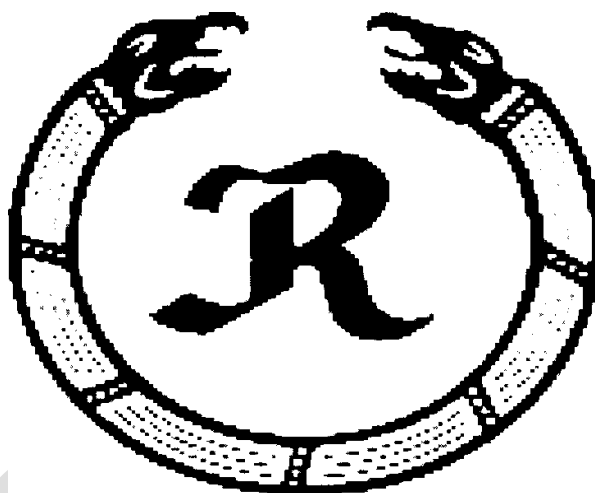


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**Policy on Prevention, Prohibition and Redressal
Of Sexual Harassment at the Work-place**

Approved By:	Date of Issue	With Effect from
Executive Committee	26 th February 2025	26 th February 2025
Issued By:	Designation:	Signature:
Kalpa Kadam	Head Human Resources & Administration	

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1.0 INTRODUCTION AND OBJECTIVES

Rallis India Limited (Rallis) strives to create and maintain a healthy, safe and productive work environment, free from discrimination and harassment. As laid out in the Tata Code of Conduct ("TCOC") Rallis strives to provide equal opportunity 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. Rallis is therefore committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at workplace, that includes prohibition and redressal of sexual harassment should it occur, by establishing robust mechanisms for prevention, reporting and addressing complaints.

At Rallis, 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:

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behavior that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of Rallis.
- Encourage all employees and stakeholder to report incidents of sexual harassment and misconduct, ensuring that our processes are gender neutral and free from discrimination

2.0 SCOPE AND COVERAGE

This policy is applicable to all Employees of Rallis in India. This policy considers the definition of Right to life, under the Constitution of India. It means right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a "safe" working environment, where employees feel secure and truly believe that their dignity is maintained.

This policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 and its rules notification and amendments published. This Act is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

3.0 DEFINITIONS

3.1 SEXUAL HARASSMENT

Sexual harassment has many different definitions and it is not the intent of this policy to limit the definition, but to give as much guidance as possible concerning what actions constitute and imply sexual harassment. Sexual Harassment includes any such "unwelcome" sexually determined conduct (Whether directly or by implication) as:

1. Physical Harassment, which includes:
 - Physical contact and advances
 - Intentional touching, pinching, grabbing, brushing against another's body
 - Sexual assault

- Cornering, trapping or blocking another's pathway
 - Excessively lengthy handshakes
 - Any physical, verbal or non-verbal or sexually implied / oriented conduct which is unwelcome
2. Verbal Harassment, which includes:
- Gesture-based harassment and sexually colored remarks.
 - Making sexually suggestive or off-color comments, threats, slurs, sexual propositions.
 - Sexual jokes or teasing, misogynist humor, sexually colored gender specific jokes.
 - Innuendoes and off-color remarks.
 - Comments about how someone looks, especially about parts of the body.
 - Catcalls, whistles and forms of address like "honey", "sweetheart", etc.
3. Quid pro quo sexual harassment
- Demand or request for sexual favours over promises related to employment such as work conditions, promotion, increments, etc.
 - Implied or explicit promise of preferential or detrimental treatment in his/her/their employment.
 - Any implied or explicit threat about his/her/their present or future employment status; or
 - interference with her work or creating an intimidating or offensive or hostile work environment for his/her/their humiliating treatment likely to affect his/her/their health or safety
4. Written or Graphic Harassment, which includes:
- Showing pornography, and
 - The display of pornographic material and watching pornography
 - Written material that is sexual in nature such a letter or notes containing a sexual comment.
 - Leering or staring at another's body and / or sexually suggested gesturing.
 - Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of a sexual nature.
 - Sexualized environments and behaviors or objects that even if not directed at anyone in particular creates an offensive environment.
 - Any other unwelcome physical, verbal or nonverbal conduct of sexual orientation or nature.

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

Whilst the definition of Sexual Harassment is very clear under the Laws that have been created for prevention of Sexual Harassment, Rallis India Limited has extended the scope of its policy to include redressal not only for woman for the sexual harassment that may be caused to them as defined above, but this policy also covers any kind of a similar harassment that may take place between two persons; gender not being the point of contention. This policy will be applicable to all persons mentioned in the scope and accordingly action will be taken on a complaint being received by any person against any person; extending this policy to make it gender neutral.

3.2 AGGRIEVED INDIVIDUAL

An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment

3.3 COMPLAINANT

A Complainant is any Aggrieved Individual or (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) his/ her legal heir or such other person as prescribed below, who makes a complaint alleging Sexual Harassment under this Policy.

3.4 EMPLOYEE

An Employee means a person employed with Rallis for any work on permanent, temporary, part time, adhoc or daily wage 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.

3.5 RESPONDENT

A Respondent means the person against whom the Complainant has made a Complaint.

3.6 SPECIAL EDUCATOR

A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

3.7 WORK PLACE

Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by Rallis. Places visited by the Employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

4.0 INTERNAL COMMITTEE (IC)

The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 has stipulated that every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the "Internal Committee": In Rallis, it is "Prevention of Sexual Harassment Committee" – "POSH" Committee: which shall redress complaints on sexual harassment. The committee shall comprise the following:

- IC should consist of atleast four members and will have representation of men and women with at least one-half of the total members as women.
- A senior level woman employee shall be appointed as the presiding officer of the IC ("Presiding Officer"). The Presiding Officer shall automatically vacate her office upon ceasing to be employee of Rallis.
- Minimum two members of the IC will be appointed from amongst employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge. The members shall automatically vacate their role as IC member upon ceasing to be Employees of Rallis.
- One 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.
- The Presiding Officer and every member of the IC shall hold office for a period of three years.
- A member of the IC may resign at any time by tendering his / her resignation in writing to the Company

4.1 CONSTITUTION OF IC – POSH COMMITTEE: (50% OF THE COMMITTEE TO BE WOMEN)

4.1.1 Member 1: Presiding Officer (should be a Woman)

4.1.2 Member 2: Member Secretary

4.1.3 Member 3: Committee member

4.1.4 Member 4: To be nominated from NGO who are committed to the cause of women / Subject matter expert who has Knowledge about this subject.

4.1.5 Additional members: To be nominated from employees representing significant locations

"Sexual Harassment of Women At Workplace (Prevention, Prohibition & Redressal) Act, 2013, provides constitution of the "Internal Committee" to be constituted at all offices and administrative units of the workplace as located at different places. However for the process of convenience, there is "POSH" committee representative member from each administrative office.

4.2 REMOVAL OR REPLACEMENT OF IC MEMBER OR PRESIDING OFFICER

In the event that the Presiding Officer and / or any member of the IC

- Resign at any time by tendering resignation in writing to Rallis.
- Contravenes any provisions of the Policy; or
- Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- Has so abused his / her position as to render his / her continuance in office prejudicial to public interest, such Presiding Officer or member as the case may be, shall be removed from the IC. Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by Rallis in accordance with the appropriate guidelines.

5.0 GUIDELINES

5.1 The contents of the complaint made the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner. If the same is violated, Rallis shall recover a sum of Rupees five thousand as penalty from such person or take action as per the provisions of the service rules.

5.2 The contents of the report of IC shall be kept confidential by IC and Rallis.

5.3 However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

5.4 The Presiding Officer or any member of the IC shall render all reasonable assistance to the Complainant for making the complaint in writing.

5.5 The IC may consider various factors as required under the law for the purpose of determining the sums to be paid to the Aggrieved Individual.

5.6 In case a witness has given false evidence or produced any forged or misleading document during the inquiry, action may be taken against the said witness in accordance with the provisions of the service rules applicable.

5.7 The IC shall ensure that the principles of natural justice are adhered to in relation to the conduct of hearings upon a Complaint and both the Complainant and the Respondent are provided with a fair opportunity to make their submissions.

5.8 Any refusal by any Employee of Rallis to attend any hearing before the IC when summoned or to provide to the IC, any documents and / or information within his / her power or possession shall constitute a misconduct under Rallis' service rules, rendering such Employee for adverse action by Rallis.

5.9 Non Retaliation

Rallis will not accept, support or tolerate retaliation in any form against any employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action.

- Retaliation will be treated as a major misconduct.
- Retaliation against those reporting sexual harassment is prohibited by this policy.
- Retaliation means and includes any hurtful employment action against an individual/s.

- Anyone suspecting or experiencing retaliation should report to the appropriate authorities.
- Anyone feeling that a retaliation complaint did not get a prompt response can contact Group Chief Ethics Officer directly.
- Retaliation cases are treated as seriously as an alleged case of sexual harassment even if the original harassment complaint is not proven.

6.0 PROCESS

6.1 COMPLAINT OF SEXUAL HARASSMENT

6.1.1 A Complainant can make, in writing, a complaint of Sexual Harassment to the Internal Committee (IC), within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The IC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the said period.

6.1.2 If the Aggrieved Individual is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:

- his/her relative or friend; or
- his/her 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 Individual

6.1.3 If the Aggrieved Individual is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by:

- his/her relative or friend; or
- a special educator; or
- a qualified psychiatrist or psychologist; or
- the guardian or authority under whose care he/she is receiving treatment or care; or
- any person who has knowledge of the incident jointly with the Aggrieved Individual's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care

6.1.4 If the Aggrieved Individual 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 his/her written consent.

6.1.5 If the Aggrieved Individual is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

6.1.6 The form in which the complaint is required to be made is annexed as Annexure 1 to the Policy. This form will be available with the IC, www.rallis.com and also on the intranet. However, any written complaint received in any form other than the form prescribed in Annexure 1 shall also be accepted. The complaint can be submitted to the IC electronically at posh@rallis.com or may be physically submitted to any IC member. The IC may, but shall not be bound to, accept oral complaints under this Policy.

6.1.7 The Complainant shall submit six copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.

- All complaints should be in writing and signed by the complainant to ensure consistency and accuracy of what has been complained of.
- The complainant is required to state explicitly the incident/s with date and time, place, circumstances prevailing at that time.
- Whilst the law provides for a redressal mechanism only when a written complaint is filed, Rallis provides for an informal redressal mechanism because there are many individuals who may not wish to file a written complaint.
- An alternate route to communicate a concern is to the Location Ethics Counsellor, who shall treat the concern as a violation of the CoC and immediately inform the POSH Committee.
- At this level as well, strictest confidentiality shall be observed, therefore restricting all information generated to the smallest possible group.

6.2 CONCILIATION

Prior to initiating an inquiry, the IC may, at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation. In case the settlement has been arrived at the IC shall record the settlement so arrived and forward the same to Rallis to take action as specified in the recommendation of the IC.

The IC will provide copies of the settlement as recorded to the Complainant and the Respondent. Upon a conciliation being reached, the IC would not be required to conduct any further inquiry.

6.3 INQUIRY

6.3.1 Subject to the above and in the event of any term or condition of the settlement not been complied with by the Respondent, the IC shall conduct an inquiry regarding the complaint.

6.3.2 All forms of evidence shall be admissible in the investigation process, including but not limited to verbal recordings, WhatsApp chats, and other electronic or written communications. The organization is committed to considering all relevant and pertinent proofs, including evidence that may be deleted or otherwise altered, to ensure a comprehensive and equitable investigation.

6.3.3 On receipt of the complaint, the IC shall send one of the copies received from the Complainant to the Respondent within a period of seven working days.

6.3.4 The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents.

6.3.5 The IC shall make an inquiry into the complaint in accordance with the principles of natural justice. The IC must notify in writing the time and dates of its meetings to Rallis, the Complainant and the Respondent.

6.3.6 While conducting the inquiry, a minimum of three members of the IC including the Presiding Officer or Chairperson, as the case may be, shall be present.

6.3.7 The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.

6.3.8 The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Chairperson or Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned

6.3.9 The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the internal committee. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the IC.

6.3.10 All colleagues and witnesses who are part of the IC proceedings will need to sign a confidentiality agreement.

6.3.11 During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings.

6.3.12 The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint.

6.4 ACTION DURING PENDENCY OF INQUIRY

6.4.1 During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend the following to Rallis:

- transfer the Aggrieved Individual or the Respondent to any other workplace
- grant leave to the Aggrieved Individual upto a period of three months
- grant such other relief to the Aggrieved individual as may be prescribed under applicable laws
- restraint the respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer

6.4.2 The leave granted to the Aggrieved Individual shall be in addition to the leave he /she is otherwise entitled to.

6.4.3 On receiving a recommendation from the IC, Rallis shall implement the recommendations and send a report of such implementation to the IC.

6.5 INQUIRY REPORT AND ACTIONS

6.5.1 On the completion of an inquiry the IC shall provide a written report of its findings to Rallis within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

6.5.2 In the event that the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to Rallis that no action is required to be taken in the matter.

6.5.3 Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to Rallis to take action against the Respondent, which may include:

- a written apology from the Respondent
- a letter of warning may be placed in the personal file of the Respondent
- reprimand or censure
- immediate transfer or suspension without pay
 - termination from service
 - withholding of pay rise or increments
 - undergoing a counseling session
 - carrying out community service
 - register an FIR against the Respondent .in case the act alleged, prima facie constitutes an offense under The Bharatiya Nyaya Sanhita, 2023 (BNS) Annexure 2 or any other law for the time being in force.

- deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/ her legal heirs. For the purpose of determining the sums to be paid to the aggrieved individual under, the Internal Committee shall have regard to --
 - the mental trauma, pain, suffering and emotional distress caused to the aggrieved individual;
 - the loss in the career opportunity due to the incident of sexual harassment;
 - medical expenses incurred by the victim for physical or psychiatric treatment;
 - the income and financial status of the Respondent ;
 - Feasibility of such payment in lump sum or in installments.

6.5.4 In case Rallis is unable to make deductions from the salary of the Respondent due to his being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum referred above, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer

6.5.5 Rallis shall act upon the recommendation given by IC within sixty days of receipt of the recommendation

6.5.6 Rights of the Complainant/ Respondent: To receive an empathetic attitude from the Internal Committee so that he/ she can state his/her grievance in a fearless environment.

- To a patient hearing to present his/her case in a non-biased manner
- To receive a copy of the response along with all the evidence and a list of witnesses submitted by the respondent/ complainant, if there is no request of anonymity from the witnesses.
- Support, in lodging FIR in case the complainant chooses to lodge criminal proceedings.
- In case of fear of intimidation from the respondent, the cross-examination statement of the complainant can be recorded in absence of the respondent.
- Right to appeal as per POSH Act, in case, not satisfied with the recommendations/findings of the Internal Committee.

6.6 MALICIOUS COMPLAINT

In case the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to Rallis to take suitable action against the Complainant who has made the complaint, in accordance with the provisions of the applicable service rules or as prescribed under applicable law.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. Further, the malicious intent on part of the Complainant needs to be established through the inquiry process before any action against such Complainant is recommended by the IC to Rallis.

6.7 APPEAL

In the event that any person is aggrieved from the recommendations made by the IC or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by the law, within a period of ninety days of the recommendations

7.0 ROLES AND RESPONSIBILITIES

7.1 EMPLOYEES

As a custodian of the Rallis Values, Tata Code of Conduct and statutory guidelines, employees have the following responsibilities:

- To forward or submit to the IC any written complaint from any Aggrieved Individual and to support/ co-operate during any inquiry as part of the inquiry process. Be aware of and abide by laws applicable to them, their job and Rallis policies and procedures.
- Be aware of, and do not participate in any prohibited or inappropriate behaviors or activities while representing Rallis
- Be aware that Rallis will take allegations seriously and will ask their cooperation in an inquiry if they bring a complaint forward
- Participate in the procedure of inquiry if a complaint is brought forward, it will be reviewed. If an employee elects not to participate in the procedure constituted by Company and does not wish to proceed with the complaint, it will need to be formally withdrawn. The complaint will still be reviewed and the findings of the complaint will be explained in writing. It will be the discretion of the management to accept or reject the request for withdrawal of the complaint
- Provide a full and truthful disclosure of relevant information and assist with inquiry of alleged policy violations.
- Handle information related to known or suspected violations of this policy in a discreet and confidential manner.
- Not attempt to investigate the information or suspected violations of this policy on their own i.e. without involving the IC.
- Set an example of proper workplace behaviour and ethical standards in line with Rallis' values and the Tata Code of Conduct.

7.2 MANAGER

Manager is a reporting authority or anyone who is responsible for the outcome of work and has a reporting relationship with the complainant in Rallis.

Manager has the same responsibilities as the employee, as well as these additional responsibilities as a custodian Rallis' Values, the Tata Code of Conduct and statutory guidelines. If an employee and/or stakeholder has conveyed about sexual harassment to the manager, it is the responsibility of the manager to encourage the complainant to give it in writing to him/her and the IC.

- Bring the written complaint immediately to the IC, and provide all kinds of support for the further investigations as a part of inquiry process
- Have adequate knowledge about applicable laws, and answer questions regarding relevant policies and procedures.
- Immediately forward any report or complaint of an alleged violation of this policy and all relevant or requested information to the appropriate Human Resources Business Partner.
- Keep disclosed information as confidential. Handle information in a discreet manner, and disclose confidential information strictly on a "need-to-know" basis only.
- Not attempt to inquire or verify the information unless instructed by the Human Resources or personnel in charge of the inquiry and the IC.
- Fully cooperate, facilitate and aid the prompt handling of an inquiry by IC, Human Resources or the management.
- Allow the complainant, respondent, witnesses and allied parties to attend the inquiry proceedings at the stipulated time and place.
- Carry out all corrective measures and remediation established in the final decision
- Ensure that employees are adequately communicated about Rallis' POSH policy.
- Ensure no retaliation and zero tolerance to sexual harassment or inappropriate conduct.
- Set an example of proper workplace behaviour and ethical standards in line with Rallis' Values and the Tata Code of Conduct.

7.3 HUMAN RESOURCES

Human Resource team members have the same responsibilities as the employees and additional responsibilities as a custodian of the Tata Values, Tata code of Conduct and statutory guidelines.

- Make information, policies and procedures available to employees
- Take cognizance of the written complaint and bring the complaint immediately to the IC and provide all kinds of support for the further investigations as a part of inquiry process.
- Ensure that employees and stakeholders are communicated properly about this POSH policy.
- Not attempt to inquire or verify the information unless instructed personnel in charge of the investigation and the IC
- Carry out all corrective measures and remediation established in the final decision.
- Set an example of proper and appropriate workplace behavior and ethical standards in line with Rallis' Values and the Code of Conduct

7.4 IC (POSH COMMITTEE)

IC members have the same responsibilities as the employees and additional responsibilities as a custodian of the Rallis' Values, Tata Code of Conduct and statutory guidelines.

- To be fair while making the assessment of the situation, inquiring and giving the verdict
- Conduct the inquiry process and recommend appropriate actions as per the process outlined in section 6 of this document in line with the statutory requirements applicable.
- Inform the parties involved in the inquiry proceedings well in time and in writing.
- Follow the principles of natural justice and treat the complainant, respondent, witnesses and related persons to the inquiry with dignity and respect
- Submit to Rallis an annual report comprising details of all cases and actions taken.
- Keep disclosed information as confidential. Handle information in a discreet manner and disclose confidential information strictly on a "need-to-know" basis only.
- If an employee faces sexual harassment outside of Rallis' work and work premises, assist them in filing a complaint in the police station as appropriate.
- Set an example of proper and appropriate workplace behaviour and ethical standards in line with Rallis' Values and Tata Code of Conduct
- In case the Committee finds the degree of offence coverable under the BNS, 2023 then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint as may be appropriate.

7.5 RALLIS-THE COMPANY

Rallis is responsible for providing a safe working environment for its employees, free from harassment, bias and prejudice of any kind. Towards this end it will:

- Treat sexual harassment as misconduct under the service rules and take appropriate action for the same
- Encourage respectful and dignified behavior at workplace at all times by all
- Have zero tolerance towards acts of sexual harassment
- List of IC Committee members is made available on intranet (Tarang) and Regional committee members' list is displayed at all locations
- Display at conspicuous places in the workplace, the penal consequences of Sexual Harassment.
- Organize workshops and awareness programs at regular intervals for sensitizing employees with the provisions of this policy
- New employees, mandatorily go through the POSH training as part of their induction programme

- All employees are required to undergo a refresher POSH training annually
- In order that this is done, appropriate and inappropriate behavior must be conveyed to every employee of organization, including contractors, fixed time hires, retainers, third party vendors, suppliers etc.
- Gender Sensitivity Training shall be organized for them to make them aware of the gender dynamics that take place within a work environment; this will help them to get a fuller understanding of the different perceptions of appropriate behavior. Regular refresher sessions to be conducted for the POSH Committee to update changes in the law.
- Organize orientation and skill building programs for members of the IC.
- Ensure that necessary facilities and information are provided to the IC for dealing with the complaint and conducting an inquiry.

Assist in securing the attendance of the Respondent and witnesses before the IC and make available such information to the IC as it may require with regards to the complaints.

- Provide assistance to the Complainant if the Complainant chooses to file a complaint in relation to the offence under BNS, 2023 or any other law for the time being in force.
- Cause to initiate action, under BNS, 2023 or any other law for the time being in force, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of Sexual Harassment took place.
- Monitor the timely submission of reports by the IC.
- At its sole discretion, may provide additional facilities to the aggrieved individual including:
 - An option for a transfer of the Aggrieved Individual or the Respondent who is proved to be guilty, to any other workplace.
 - an option for a change of role / department (if feasible)
 - support to the Aggrieved Individual to undergo professional counseling at the discretion of IC, provide for compensation for mental trauma, pain and distress suffered, for loss in career opportunity etc. based on various relevant factors including salary and financial status of the Respondent.

8.0 EXCEPTIONS

Any exception to this policy requires the approval of the Chief Ethics Counselor and Head HR & Business Excellence

9.0 AMENDMENTS

Rallis reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment

Note: While complete care has been taken to incorporate all the relevant provision of the "Sexual Harassment of Women At Workplace (Prevention, Prohibition & Redressal) Act, 2013 into the policy, if at any time there is a discrepancy found between the Act and the Policy, the provisions of the Act shall prevail.

Annexure 1
Complaint form

1. Details of Aggrieved Individual

Name	Designation	Division and Department	Contact Number	Office Address

2. Details of Complainant (in case the Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Individual	Contact Numbers	Address

3. Details of individual alleged to have engaged in sexual harassment

Name	Designation	Division and Department	Contact Number	Office Address

4. Details of the incident(s)

Sr. No.	Nature / Description of Incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

1. Has a report regarding these incidents been filled with any other agency?

Yes () No ()

If Yes, with whom?

2. Additional information and comments if any

Signature of Aggrieved Individual	Date:
Signature of Complainant:	Date:

ANNEXURE 2

SECTIONS OF THE BHARATIYA NYAYA SANHITA, 2023 (BNS) – SEXUAL HARASSMENT AND PUNISHMENT FOR SEXUAL HARASSMENT

Under the Bharatiya Nyaya Sanhita, Section 75 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 favors; or
 - (iii) showing pornography against the will of a woman; or
 - (iv) making sexually colored 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 for a term which may extend to one year, or with fine, or with both.

In addition to Section 75 set out above, acts of Sexual Harassment may also constitute other offenses under BNS including Section 74 (assault or use of criminal force to woman with intent to outrage her modesty), Section 77 (Voyeurism), Section 78 (Stalking), Section 63 and 64 (Rape) and Section 79 (word, gesture or act intended to insult the modesty of a woman) of the BNS, 2023.