

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES

1.0 POLICY

- 1.1 The **ROX HI-TECH LIMITED** is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity.

Sexual harassment at the workplace or other than the workplace if involving employees is a grave offense and is, therefore, punishable.

- 1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2.0 SCOPE AND EFFECTIVE DATE

- 2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3.0 WHAT IS SEXUAL HARASSMENT?

- 3.1 Any uninvited sexual behavior from persons of the same or opposite sex.
- 3.2 Behaviour that offends the dignity of the individual to whom it is directed.
- 3.3 The point of consideration should be the effect that the conduct of one person has on another, rather than whether the behavior was intentionally offensive or not.
- 3.4 Persons using their positions of power to degrade and humiliate or demand sexual favours.

The following behavior is considered inappropriate within the Rox Trading & Systems Pvt Ltd and Rox Technology is liable for disciplinary action:

Verbal Harassment:

- i. A demand or request for sexual favours.
- ii. Comments about a person's sex or personal life.
- iii. Sexually coloured remarks.

Physical harassment (this is liable for action under the Indian Penal Code):

- i. Offensive gestures.
- ii. Touching in a sexual manner.
- iii. Assault or coerced/forced sexual acts.

Written or graphic harassment:

- i. Display of sexually suggestive objects, magazines, pictures or posters in the work area.
- ii. Unsolicited forwarding of pornographic pictures through e mail or MMS.
- iii. Written communication that may have sexual implications.

Emotional harassment:

- i. Behaviour that is discriminatory towards or excludes a person on the grounds of his or her sex.
- ii. Demanding sexual favours in exchange for or with a promise of a favourable performance appraisal, promotion and sustained employment.
- iii. Stalking or following a person.

Hostile work environment harassment:

Harassment by non – hierarchal employees generally falls in this category. Here there is no direct link between the offensive conduct and a tangible job benefit.

Third Party Harassment:

As per the Supreme Court guidelines, Third Party Harassment occurs as a result of an act or omission by any third party or outsider. In this case, the employer & person in charge will take necessary and reasonable steps to assist the affected person in terms of support and preventive action. In the case of the hospital, this would cover any harassment of a sexual nature by a patient, relation or visitor.

- 2.3 “**Employee**” means any person on the rolls of the Company including those on deputation, contract, temporary, outsource, part time or working as consultants.

3.0 COMPLAINT REDRESSAL COMMITTEE

- 3.1 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of The committee are as follows:

Committee

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| 1. Ms. Sukanya Rakesh | Chairperson |
| 2. Ms. P.Julie Caroline | Member |
| 3. Mr. Bharanidharan | Member |
| 4. Mr. Karthik Kalaimani | Member |
| 5. Concerned Ethics Officers at locations- | Member |

- 3.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

4.0 REDRESSAL PROCESS

- 4.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 3 days of occurrence of incident.
- 4.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 4.3 The Committee will hold a meeting with the Complainant within two days of the receipt of the complaint, but no later than five days in any case.
- 4.4 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. The complainant and accused may be permitted to bring an employee of their choice to the meeting.
- 4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 4.6 In the event, the complaint does not fall under the purview of Sexual

Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

- 4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5.0 ENQUIRY PROCESS

- 5.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 5.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 3 days of receipt of the same.
- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 If the Complainant or the person against whom complaint is made desires any witness/ es to be called, they shall communicate in writing to the Committee the names of witness/ es whom they propose to call.
- 5.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 5.6 The Committee shall call upon all witnesses mentioned by both the Parties.
- 5.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- 5.8 In case the Committee find the degree of offence coverable under the Indian Penal Code, then it should advise the complainant to simultaneously file a police complaint. The Management should assist the complainant in doing so.

- 5.9 The Committee shall complete the “Enquiry” within reasonable period but not beyond 15 days and communicate its findings and its recommendations for action to the Human Resource. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 5.10 The Human Resource will recommend appropriate action in accordance with the recommendation proposed by the Committee to the CEO.
- 5.11 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

6.0 OTHER POINTS TO BE CONSIDERED

- 6.1 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 6.2 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Rox Trading & Systems Pvt Ltd shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action. It is also applicable for Rox employees while on work in the respective client place.
- 6.3 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Human Resource.
- 6.4 In case the Committee find the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

Strategy for Communication of Policy:

- 7.1 Policy affirmation: All employees shall be required to sign this policy as prescribed here under. This policy will be attached with the Employment Contract of all new staff.
- 7.2 Orientation and training of all employees at the earliest on the Policy on Sexual Harassment at Workplace (Prevention and Redressal).
- 7.3 Setting up and capacity building of the Redressal Committee on Sexual Harassment at Workplace (Prevention and Redressal).The Committee will evolve a process to be followed from receipt of complaint till preparation of the final report.
- 7.4 The Committee will meet twice a year to review the situation, plan awareness programs, and discuss related issues.
- 7.5 Middle Managers will be responsible for ensuring a harassment-free and congenial environment of mutual trust among employees. This function will be part of their responsibility and they will be trained to handle such issues.
- 7.6 Constant reinforcement of the policy shall be ensured by discussions about these issues by top management and staff in various appropriate forums.