



Revent Metalcast Limited
Prevention of Sexual Harassment at Workplace
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PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

REVENT METALCAST LIMITED

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1. POLICY STATEMENT & OBJECTIVE

At **Revent Metalcast Limited ("Company")**, we are committed to maintaining a workplace that is safe, transparent, and welcoming for all employees. Our core philosophy revolves around understanding our employees and fostering their confidence in a fair, transparent, and secure work environment.

In alignment with the directives of the Supreme Court, we have established this policy to provide guidelines and a formal mechanism for addressing grievances related to sexual harassment. This policy is designed in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and the rules framed thereunder.

While the policy comprehensively addresses the key aspects of the Act, in case of any ambiguity or the need for further clarification, reference shall always be made to the Act and its subsequent amendments, which shall take precedence.

2. SCOPE AND APPLICABILITY

Scope:

The scope of this policy would extend to all the locations of the Company. The defined locations under this clause will be together referred to as "Premise". These include

- Any official business locations of the Company.
- Any external location visited by an Employee due to or during employment with the Company, such as business locations of other organizations/entities, guest houses, hotels etc.; or
- Any mode of transportation provided by the Company (or its representatives) for travel to and from the locations.

Applicability:

This policy is applicable to:

1. **Employees:** All personnel employed by the Company, including permanent, contractual, and temporary employees.
2. **Aggrieved Person:** All individuals visiting the Company's Premises for any purpose, such as customers, visitors, or other stakeholders.

3. ROLE AND RESPONSIBILITIES

3.1 Responsibilities of each Individual: Each individual is responsible for respecting the rights of others and actively discouraging harassment. This includes:

- a. Refraining from participating in any activities that includes sexual harassment
- b. Supporting individuals who are rejecting unwelcome behavior
- c. Acting as a witness if the person experiencing sexual harassment decides to lodge a complaint

Individuals are encouraged to inform others if their behaviour is unwelcome. While unintentional actions may cause discomfort, such instances provide an opportunity for the individual to recognize, correct, and cease inappropriate behaviour.

3.2 Responsibilities of Managers, HODs and Business Unit Heads:

- Ensure a workplace free from sexual harassment and promote equal treatment for all employees.
- Communicate clearly that sexual harassment is unacceptable and will not be tolerated.
- Take complaints of sexual harassment seriously and ensure thorough investigation and resolution only through the process as laid down under this policy.
- Protect complainants, respondents, and witnesses from any form of retaliation or victimization.

4. DEFINITIONS

1. Sexual Harassment

Sexual harassment is any unwelcome sexual behavior that can affect the career, salary, job, or work environment of another person. It may occur not only in situations where one individual uses such behavior to exert control or influence over another but also between coworkers or between a **Revent Metalcast Limited** employee and an external party with whom the employee interacts during the course of work.

Sexual harassment includes, but is not limited to, the following unwelcome acts or behaviors, whether explicit or implied:

a) Unwelcome sexually-oriented behaviour or patterns of conduct causing discomfort or humiliation to the recipient, such as:

1. Physical contact or advances.
2. Demands or requests for sexual Favors.
3. Sexually suggestive remarks or comments about a person's clothing, body, or appearance.
4. Showing pornography, sharing sexually explicit material (e.g., through email, SMS, MMS), or engaging in sexual pranks, teasing, jokes, or sharing demeaning pictures, cartoons, or other content.
5. Repeatedly requesting social interactions outside of work hours or expressing unwelcome sexual interest.
6. Giving sexually suggestive gifts or leaving inappropriate objects.
7. Acts like eve-teasing, inappropriate comments, physical confinement, or actions intruding upon an individual's privacy.
8. Persistent stalking, following, or unwanted communication.
9. Sharing sexually explicit content via platforms such as WhatsApp or email.

b) Circumstances that constitute sexual harassment in relation to the aforementioned acts include:

1. An implied or explicit promise of preferential treatment in employment.
2. An implied or explicit threat of adverse treatment in employment.
3. An implied or explicit threat to the current or future employment status of the individual.
4. Interference with a person's work, or the creation of an intimidating, hostile, or offensive work environment.
5. Humiliating treatment (having sexual connotations) that could affect an individual's health or safety.

The assessment of whether conduct constitutes sexual harassment will be based on the **reasonable person standard**—whether the behaviour would be offensive to a reasonable person in similar circumstances. It is important to note that determining sexual harassment does not depend on the intent of the person engaging in the behaviour but rather on the experience of the aggrieved individual.

2. Aggrieved person: In the context of a workplace, this refers to any person, regardless of age or employment status (including employees, contractual workers, temporary staff, or visitors), who alleges having been subjected to any act of sexual harassment by the respondent.

3. Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved person.

4. Employee: A person employed at the workplace, for any work on regular, temporary, ad-hoc 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

5. Workplace: In addition to the designated places of work, such as the Head Office, Branch Offices, and Factories, this shall also include any location that the aggrieved person or the respondent visits in connection with their work, during or arising from their employment, contract, or engagement with **Revent Metalcast Limited**. This includes any transportation provided for such work-related travel.

- 6. **Employer:** A person responsible for management, supervision, and control of the workplace
- 7. **Internal committee:** "Internal Committee" means an Internal Complaints Committee constituted under section 4;
- 8. **Presiding officer:** means the Presiding Officer of the Internal Complaints Committee nominated under sub-section (2) of section 4;

5. REDRESSAL OF COMPLAINTS – PROCESS AND PROCEDURE

The Company has implemented a process to ensure that incidents and complaints of sexual harassment are handled with sensitivity, confidentiality, and fairness, in a transparent manner. In compliance with the Act, if a complaint requires formal intervention, the complainant must submit a written complaint to the Internal Committee, which will follow the formal redressal procedure outlined in this policy. For verbal complaints, the recipient will document the complaint in writing and obtain the complainant's signature.

i) THE INTERNAL COMMITTEE FOR PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT RELATED ISSUES

The "Internal Committee" ("**Committee**" or "**IC**") is constituted by the Board of Directors or Authorized person of the Company. The primary responsibility of the Committee is to ensure that all complaints are addressed appropriately. The Head of HR, in collaboration with the Compliance Officer of **Revent Metalcast Limited**, will assist the Committee in fulfilling its duties.

The constitution of the Committee will be as per the provisions of the Act. The Company will announce the names and contact details of the members of this Committee for all the employees and display the same in places easily accessible to employees and visitors, alike. These are also to be brought out in Annexure I to this policy. Annexure I would be amended as and when the Committee is constituted or re-constituted.

The Committee will be constituted as per the following guidelines at all the locations of the Company:

Member Category	No. of Members	Remarks
Presiding Officer	1	A woman employed at a senior level within the organization or workplace.
Employee	2 or more	At least two employees who are committed to the cause of women's rights and/or possess legal knowledge will be nominated to the Committee.
External Member	1	A representative from an NGO or association dedicated to the prevention of sexual harassment or experienced in addressing related issues.

It may be noted that:

- In case a senior level woman employee is not available, the Presiding Officer can be nominated from either location of **Revent Metalcast Limited**
- It is mandatory that at least one half of the total members of the Internal Committee so appointed be women members.

The Committee will be responsible for dealing with all complaints of sexual harassment pertaining to any Premise as per procedure prescribed under the Act. In case necessitated by circumstances like conflict of interest, unavailability of members, or sudden spike in number of complaints, the Presiding Officer of the Committee may request the appropriate authority, to reconstitute/reassign members to ensure that the investigation is carried in a fair and just manner.

ii) **PROCESS FOR DEALING WITH INCIDENTS AND COMPLAINTS OF SEXUAL HARASSMENT**

Any Employee or Aggrieved person who experiences sexual harassment at the Premise must file and submit a detailed complaint along with any documentary evidence available or names of witnesses in writing to any of the committee members at the workplace.

The complaint must be lodged within 3 months from the date of the incident / last incident. The committee may extend the timelines if there are substantial reasons, justifications or circumstances which have prevented the employee from lodging the complaint.

If the employee/Aggrieved Person cannot make such a complaint in writing, the Presiding Officer or any Member of the IC would render all reasonable assistance to the said person for making the complaint in writing.

It is always advised not to delay in filing the complaint if any such untoward incident happens at the workplace to conduct a thorough investigation and take prompt action.

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.

Receiving a 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 to be kept in mind by the receiver of the complaint:

- The complaint is acknowledged, and the complainant is assured that the company takes their concerns seriously.
- Complainant is informed that the concerns raised will be reported to the IC who will take forward action
- Situations must not be prejudged.
- All notes and details of the concern raised are to be kept strictly confidential
- Complainants' agreement is taken to allow proceeding with the matter which involves formal investigation

Resolution Procedure through settlement and conciliation

Once the complaint is received, before initiating any inquiry, the committee may take steps to settle and conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved person.

If such settlement is reached, the committee will record the settlement and action will be taken by the company as specified in the recommendation.

Copies of the settlement will also be provided to the employee or aggrieved person and the respondent. However, it is to be noted that where a settlement is arrived at, no further inquiry will be made by the committee, unless the terms of the settlement have not been complied with.

The resolution through settlement and conciliation will happen within 3 weeks of receipt of the complaint.

Resolution procedure through formal Inquiry

The Committee shall initiate Inquiry in the following cases:

- No conciliation is requested by aggrieved person
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation has not been complied with by respondent.
- If the aggrieved does not request for a settlement

If the employee or aggrieved person does not request for a settlement on receipt of such a complaint, the committee will immediately arrange to fully investigate all relevant details of the matter.

The committee will ensure that both parties are given a reasonable opportunity to be heard. A copy of the findings will also be provided to both parties, allowing them to present any representations against the findings before the committee.

Upon receipt of the complaint, the committee shall send 1(One) copy of the complaint to respondent within 7 (Seven) working days

The inquiry will be completed within 90 (Ninety) days. Further, within 10 (Ten) days of completion of the inquiry, the committee will formally record the results of the inquiries and forward its recommendation for appropriate action to the concerned officers of the company who will act upon such recommendations of the committee within 60 (Sixty) days.

The Internal Committee shall conduct inquiry into the complaints in accordance with the principles of natural justice.

Interim Relief

During pendency of the inquiry, the complainant may submit written request to the committee for any of the following as an interim measure of relief:

- Transfer of either of the parties to any other workplace; or
- Grant leave to the aggrieved person for a maximum period of 3 months or till the conclusion of the inquiry in addition to his/her normal leave entitlement
- Prevent respondent from assessing complainants work performance
- Grant such other relief as may be appropriate

The committee will consider the same in the facts and circumstances of the case and decide on the necessity of such relief or interim measures. In event that the committee recommends to the Company any of the above actions, Company shall carry out the same and inform the Committee.

Authority of the Committee for Conducting the Inquiry

For the purpose of conducting an inquiry into any complaint received from an employee or an aggrieved person, the Committee may:

- Summon and enforce the attendance of any person and examine them under oath;
- Require the discovery and production of relevant documents; and
- Perform or require the performance of any other actions as prescribed under the Act

Inquiry procedure

a) Documentation

All proceedings of the inquiry are documented. The committee shall conduct separate and impartial interviews with the concerned parties and the witnesses.

b) Statement of Allegations and Response

The committee shall clearly state the allegation and identify the complainant. The respondent shall be given a full opportunity to respond, present evidence, and provide any relevant information. Detailed notes of all meetings shall be prepared and may be shared with the respondent and complainant upon request. Any witnesses provided by the parties shall also be interviewed, with their statements duly recorded.

c) Witness Cross-Examination

If either the complainant or the respondent wishes to cross-examine a witness, the committee shall facilitate the process and record all such statements.

d) Questioning Process

If the complainant or respondent would want to question the other party, they may submit the questions to the committee, which would ask the questions from the concerned party and record the responses.

e) Timely Completion

The inquiry, including submission of the final report, is to be completed within 90 (Ninety) days from the inquiry's start date. The procedure ensures fairness and impartiality for all parties involved.

Considerations for Preparing an Inquiry Report

When drafting findings and recommendations, the following should be considered:

- Whether any language (written or spoken), visual materials, or physical behaviour was sexual or derogatory in nature.
- Whether the allegations or events logically and reasonably follow from the evidence provided.
- The credibility of the statements made by the complainant, respondent, witnesses, and supporting evidence.
- The presence of any similar facts or prior instances, such as previous reports of harassment involving the respondent.
- Whether both parties were given a fair opportunity to be heard.

The final findings report should be shared with both the complainant (in case of an employee) and the respondent, allowing them an opportunity to respond or make representations to the committee.

Actions Following Inquiry

Upon completion of the inquiry, the committee shall submit a report of its findings and recommendations to the employer within 10 (Ten) days.

Endeavour shall be made that the findings and recommendations are based on accurately recorded and established facts. However considering that the nature of complaints received hereunder may not have well established facts, the Committee shall also be guided by the concept of pre-ponderance of possibility in the process of inquiry.



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If necessary, or at the request of the complainant, respondent, or witness, **Revent Metalcast Limited's** management may implement interim measures—such as transfer, shift changes, or leave arrangements—to protect individuals from victimization or distress during or after the inquiry, pending the final decision.

i) Complaint Unsubstantiated

If the committee concludes that the allegations against the respondent are unproven, it will recommend to the employer that no further action is required.

Additionally, the committee will ensure that both parties are informed that the matter has been thoroughly investigated and is now considered closed.

ii) Complaint Substantiated

If the committee determines that the allegations against the respondent are substantiated, it will recommend appropriate actions for addressing sexual harassment as misconduct, in accordance with applicable service rules and organizational policies. These actions may include, but are not limited to:

- Counselling
- Censure or reprimand
- A formal apology from the respondent
- Issuance of a written warning
- Withholding promotions and/or salary increments
- Suspension
- Termination of employment
- Any other action deemed appropriate by management.

The employer at Revent shall act on the committee's recommendations within 60 (Sixty) days and confirm the implementation to the committee.

Following the implementation of these actions, the complainant's line manager, supported by HR, will conduct a follow-up to ensure that:

- The inappropriate behaviour has ceased.
- The solution is effective and satisfactory.
- Neither party is subjected to victimization.

Malicious Allegations

If the committee determines that the allegation against the respondent is malicious, or that the complainant (whether the aggrieved person or another individual) knowingly made a false complaint, or has submitted forged or misleading documents, it may recommend that the employer take appropriate action against the complainant.

Confidentiality

The identity of the complainant, respondent, witnesses, statements, and any other evidence gathered during the inquiry, along with the committee's recommendations and any actions taken by the employer, are considered confidential. These materials must not be disclosed or made accessible to the public or media.

Any individual found in violation of this confidentiality requirement will be subject to disciplinary action in accordance with applicable laws and regulations.

To raise awareness, the company may share relevant information through internal communications, ensuring that any identifying details related to the Aggrieved Person or witnesses are altered to maintain confidentiality.

Appeal (Section 18 of the Act)

Any person aggrieved by the recommendations of the Internal Committee (IC) or the non-implementation of such recommendations may file an appeal before the appropriate court or tribunal in accordance with the applicable service rules. This is without prejudice to any provisions contained in other laws currently in force. The appeal must be filed in the prescribed manner within 90 (Ninety) days from the date of communication of the recommendations.

Preparation of Annual Report and Compliance Statutes

The committee will prepare the annual report in accordance with Section 21 of the Act which shall contain the following details:

- a) The number of complaints of sexual harassment received during the year
- b) The number of complaints disposed off during the year
- c) The number of cases pending for more than 90 Days
- d) The number of workshops or awareness sessions conducted on "sexual harassment at workplace" across the company
- e) The Nature of action taken by the designated officer(s) of the Company.

The Annual report will be submitted to the Ethics Committee of the Revent Group each year.

Additionally, the HR representative on the committee shall be responsible for filing the annual report with the District Officer designated under Section 5 of the Act by the appropriate Government.

6. POLICY REVIEW

The HR & Legal team will ensure the company's compliance with its responsibilities under the Act and serve as a liaison between the internal committees and the company. Their key responsibilities include:

1. **Policy Review:**
Periodically reviewing this policy to ensure alignment with the applicable laws of the land.
2. **Employee Awareness:**
Organizing awareness programs and creating dialogue forums to sensitize all employees about the provisions of the Act and this policy.
3. **Committee Support:**
Providing necessary support to committee members during the inquiry process and ensuring that, upon its conclusion, all evidence related to complaints is securely documented and preserved with strict confidentiality.
4. **Regulatory Assistance:**
Assisting in the preparation and filing of Annual Reports with the respective District Officers.

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Date: 21/10/2024

Annexure I - Composition of the Internal Committee

The Internal Committee, as constituted by the Board or Authorized person, comprises of the following members:

<u>Internal Committee Corporate – Revent Metalcast Limited*</u>				
S. No.	Name	Role	Designation	Contact Number
1	Savita Panwar	Presiding Officer	Associate General Manager- Finance & Accounts	+91-9910067150
2	Astha Rustagi	Member	Deputy Manager- Legal & Secretarial	+91-9289389109
3	Syrus Vasania	Member	Head (Purchase & Comm.)	+91-7984261218
4	Anju Dhar	Member	EA to CEO and Senior Manager – Business Development	+91-9711102667
5	Advocate Taru Gupta	External Member	External Member	+91-9818989038

* Each location/unit of Revent Metalcast Limited has a duly constituted Internal Committee (IC), details of which can be obtained by writing to any of the above-mentioned IC member.

For Revent Metalcast Limited



Authorized Signatory

Revent Metalcast Limited

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