revalyu

# revalyu Recycling (India) Limited

## POLICY ON PREVENTION OF SEXUAL HARASSMENT AGAINST WOMEN


**REVALYU RECYCLING (INDIA) LIMITED**

**IMS (ISO 9001, ISO 14001 and ISO 45001), Oekotex Std-100, GRS (Global Recycle Standrard), OBP (Ocean Bound Plastic) and REACH.**

**Registered Office and Plant :** Gat No. 265/1-266, Village Avankhed, Taluka Dindori, Dist. Nashik - 422 202 I **Ph.:** +91 (O) 2557 228100 to 228209

**Nashik Office :** Bizsol 1/A/1B, First Floor, Plot No. 22, Indira Nagar, Wadala Road, Nashik - 422 006. I **Ph.:** +91 253 2992121

**E-mail :** info@revalyu.in I https://www.revalyu.in

**Corporate Identify Number : U17120MH1981PLC025388**

revalyu

# POLICY ON PREVENTION OF SEXUAL HARASSMENT AGAINST WOMEN

| **Name of Documents** | **Policy on Prevention of Sexual Harassment Against Women** |
|---|---|
| Document No. | **RRIL/HR/005** |
| Version | 1.0 |
| State of Documents (Policy/ Code/ Manual/Guidelines) | Policy |
| Company Name | revalyu Recycling (India) Limited |
| Issuing Authority | Whole Time Director & CEO |
| Preparing Authority | Human Resource Department |
| Effective Date | 1st April 2024 |
| Release Date | 1st April 2024 |
| Next Review Date | 31st March 2026 |

## BACKGROUND

It is our endeavor to keep our workplace at revalyu Recycling (India) Limited (the "Company) safe, transparent and friendly for people to work. We had a Policy on Prevention of Sexual Harassment Against Women for several years. The said policy was redrafted when the Sexual Harassment of women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act") was enacted to ensure safe working environment for women and to build enabling work environment that respect women's right to equality of status and opportunity.

### Applicability

The policy covers:

1. All women, who are employed with the company including but not limited to permanent, contractual or temporary employees (herein after referred to as "Employee");
2. All women, who visit the premises of company for any purpose, such as customers, visitors etc.

## SCOPE OF THIS POLICY

This policy would extend to all the location of the company. The possible location could be:

i. Any of the business location of the company; or

ii. Any external location visited by an Employee due to or during the course of employment with company, such as business locations of other organizations / entities, guest house, hotel etc.

or

iii. Any mode of transport provided by the company (or a representative of the company) to an employee for undertaking a journey to and from the locations mentioned above.

The definitions (i) – (ii) are together referred to as "Premises"

## DEFINITION OF SEXUAL HARASSMENT

A board definition of sexual harassment consists of any unwelcome physical, verbal or non-verbal conduct of unnecessary, improper or unwelcome sexual nature and may include one or more of the following acts or behavior (whether directly or by implications);

i. Unwelcome sexual advances, demands or request for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of sexual nature; or


IMS (ISO 9001, ISO 14001 and ISO 45001), Oekotex Std-100, GRS (Global Recycle Standrard), OBP (Ocean Bound Plastic) and REACH.
Registered Office and Plant : Gat No. 265/1- 266, Village-Avankhed, Taluka-Dindori, District- Nashik 422 202. India. I Ph.: +91 02557- 228100 to 228209
Nashik Office : Bizsol 1/A/1B, First Floor , Plot No. 22, Indira Nagar, Wadala Road , Nashik 422 006. I Ph.: +91 0253 - 2992121
Email. : info@revalyu.in I Web. : https://www.revalyu.in
Corporate Identity Number : U17120MH1981PLC025388

ii. Transmitting any message, by mail, telephone, electronic media including social networking websites etc., which is absence, suggestive or blatantly sexual in nature; or
iii. Any explicit or implicit communication wherein a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc., thereby creating a hostile environment; or
iv. Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes; or
v. Consistent pattern of unnecessary physical contact and advances, starting or targeting unreasonable attention at an individual in day-to-day dealings; or
vi. Any pervasive of behavior which makes women uncomfortable, insecure or feel humiliated or disadvantaged based on gender differentiation; or
vii. Stalking or making repeated unnecessary / unwelcome visits to the place of residence; or
viii. Actual sexual assault.

This is only indicative list and there can be other acts which can be constructed as sexual harassment.

**COMPANY'S APPROACH TOWARDS SEXUAL HARASSMENT**

The company view all incidents of sexual harassment seriously and follows a zero-tolerance approach towards any act of sexual harassment. All acts capable of being construed as sexual harassment are prohibited and any complaint or report of sexual harassment will be investigated and if proved, appropriate action will be taken against the offending person. The nature and seriousness of the offence will be judge by the committee (defined hereunder) depending on several factors, including the presence of the following circumstance while the aggrieved Woman was being subjected to any acts of sexual harassment:

i. Implied or explicit of preferential treatment in her employment; or
ii. Implied or explicit threat of detrimental treatment in her employment; or
iii. Implied or explicit threat about her present or future employment status; or
iv. Interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
v. Humiliating treatment likely to affect her health or safety.

The circumstances listed above ARE not exhaustive. Every proven act of sexual harassment will be treated as misconduct under the service rules and appropriate action will be taken for such a misconduct.

**COMPLAINTS HANDLING PROCESS**

The company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

**1. FORMATION OF INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT**

At all the locations and offices of the company, an "Internal Complaints Committee" (hereinafter referred to as "Committee") is constituted. The department head in each business along with the HR head is responsible for the formation of the committee and ensuring that all the complaints are addressed by the committee. The constitution of the committee is as per the provision of the Act. Company announce the names and contact details of the members of this committee and publicly display the same in common areas accessible to Employees and visitors, alike.


IMS (ISO 9001, ISO 14001 and ISO 45001), Oekotex Std-100, GRS (Global Recycle Standrard), OBP (Ocean Bound Plastic) and REACH.
Registered Office and Plant : Gat No. 265/1- 266, Village-Avankhed, Taluka-Dindori, District- Nashik 422 202. India. I Ph.: +91 02557- 228100 to 228209
Nashik Office : Bizsol 1/A/1B, First Floor , Plot No. 22, Indira Nagar, Wadala Road , Nashik 422 006. I Ph.: +91 0253 - 2992121
Email. : info@revalyu.in I Web. : https://www.revalyu.in
Corporate Identity Number : U17120MH1981PLC025388

The committee is constituted as per the following guidelines at all the locations of the company: -

| Category of the member | No. of members | Remarks |
|---|---|---|
| Presiding Officer | 1 | A senior level woman employee to be appointed Presiding Officer of the committee. |
| Employee | 2 or more | Employees of the company committed to the cause of women or having experience in social work or legal knowledge to be nominated as a part of the committee. One of them should be a HR representative or a person nominated by HR for the location. |
| NGO or Associations committed to the case of women | 1 | A member from an NGO or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment to be nominated as a part of the committee. |

Please note-

- In case a senior level woman employee is not available, the Presiding officer can be nominated from other administrative offices of the Company.
- It is mandatory that at least one – half of the total members of the Committee so appointed be women members.
- The terms of the members shall be for three years only.

The constitution of the Committee for each location will be announced separately.

## 2. PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT

Any woman who experiences sexual harassment at the Premises (hereinafter referred to as "Aggrieved Woman") must file a complaint in writing to the relevant Committee within 30 days from the date of the incident. However, this limit may be extended by the Committee for another 30 days if there are reasons, justifications or circumstances which, in their opinion, had prevented the aggrieved Woman from filling a complaint. In the event of the physical or mental incapacity or death of the Aggrieved Woman, then legal heirs can also file such a complaint on her behalf.

### i. Settlement

After filing such a complaint, if the Aggrieved Woman so request, prior to initiating an inquiry, the committee can try to settle the matter through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. If such a 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 Aggrieved Woman 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 settlement have not been complied with.

### ii. Enquiry

- if the Aggrieved Woman does not request for settlement then, on receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter.

- The committee shall make the inquiry into the complaint in accordance with the principles of Natural Justice.
- A minimum number of 3 members of the Committee, including the Presiding officer, should be present for conducting the inquiry (incase the Presiding officer file complaint then NGO nominee the presiding committee).
- Both parties will be given reasonable opportunity to be heard by the committee. A copy of the findings shall also be given to both parties to enable them to make representation against the findings before the committee.
- This inquiry will be completed within 90 days. Further, within 10 days of completion of the inquiry, the committee will formally record the result of the inquiry and forward its recommendations for appropriate action to the concerned officers of the company who will act upon such recommendations of the committee within 60 days.
- An appeal to the decision of the committee may be preferred within a period of 90 days to court or tribunal as may be prescribed under the Act

### iii. Interim Relief

Where an inquiry is initiated on a complaint then, if the complainant so desires, she can request for any of the following actions to be taken during the pendency of the complaint as an interim measure of relief:

- Transfer of either of the parties to any other workplace/department (with consent); or
- Restarting the respondent form reporting on the work performance of the complainant or writing her confidential report and assign the same to another officer; or
- Grant of such other relief to the complainant as may be prescribed under the law.

The Committee may provide such recommendation to the company to implement.

### iv. Power of the committee for conducting an Inquiry

For the purpose of conducting an inquiry into any complaint received by it from an Aggrieved woman, the committee may:

- Summon and enforce the attendance of any person and examine her on oath;
- Require the discovery and production of documents; and
- Perform or require performance of any other such act which may be prescribed under the Act.

### v. Action against the Offender

Necessary action, including but not limited to such disciplinary action as may be specified in the employment of the offender(s), will be taken with regard to such offender(s) based on the circumstance and seriousness of the offence.

### vi. Invocation of Indian Penal Code

If the Aggrieved Woman chooses to file a complaint in relation to the offence under the Indian Penal Code or any other applicable law, the Company will provide such assistance to her as she may require. Furthermore, the company may also cause to initiate action, against the offender. In the event that the offender is an employee of a different entity/organization/company, then if the aggrieved Employee so desires, the Company will initiate action in the workplace at which the incident of sexual harassment took place.


IMS (ISO 9001, ISO 14001 and ISO 45001), Oekotex Std-100, GRS (Global Recycle Standrard), OBP (Ocean Bound Plastic) and REACH.
Registered Office and Plant : Gat No. 265/1- 266, Village-Avankhed, Taluka-Dindori, District- Nashik 422 202. India. I Ph.: +91 02557- 228100 to 228209
Nashik Office : Bizsol 1/A/1B, First Floor , Plot No. 22, Indira Nagar, Wadala Road , Nashik 422 006. I Ph.: +91 0253 - 2992121
Email. : info@revalyu.in I Web. : https://www.revalyu.in
Corporate Identity Number : U17120MH1981PLC025388

**vii. Frivolous or Malicious Complaints**

Where the committee arrives at a conclusion that the allegation against the offender is malicious or the complainant has made the complaint knowing it to be false or has produced any forged or misleading document, then the same will be viewed very seriously by the company and appropriate action will be taken against such complaints.

**viii. Confidentiality of the Complainant**

Any complaints or incidents reported under this policy shall be treated with all possible care, sensitivity and discretion in protecting the sensibilities of the affected person and no information will be divulged publicly or to any third party which can enable identification of the affected person.
All HOD/section head are advised to implement the said policy and ensure strict adherence to the provision of the Act and the rules.

**ix. Preparation of Annual report and compliance with appropriate Government**

The committee will prepare the annual report in accordance with ICC 2013, section 21 of the Act which shall contain the following details:

a) Number of compliant of sexual harassment received in calendar the year.
b) Number of complaints disposed off during the calendar year.
c) Number of cases pending for more than 90days
d) Number of workshops or awareness programs against sexual harassment carried out
e) Nature of action taken by the concerned officers of the company.

The annual report will be submitted to the concern authority and to the board.

In the committee, an HR representative is nominated. It will be the duty of this person to file annual report with the District officer notified under section 5 of the Act by the appropriate Government.

We conduct orientation programs and create forums for dialogue so that the Employee are aware of the provision of Act.

This policy shall supersede all the other policy related to "**Policy on Prevention of Sexual Harassment against Women**".

**Makarand Kulkarni**
**Whole Time Director & CEO**