
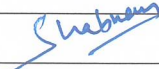

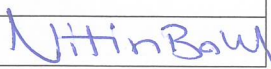


Name of the Policy	PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH) AT WORKPLACE POLICY		 Radiant <small>Smarter Technology. Better Solutions.</small>
Policy No.	RPPL /HR/POL/04		
Applicable to	All EMPLOYEES (PERMANENT, CONTRACT, TRAINEES ON DEPUTATION, APPRENTICES, VISITORS, AND CONSULTANTS).	Effective date	2 nd JANUARY'2024
Approved By	HEAD-HR	CFO	CEO
Signature			

1. Introduction

Radiant Polymers Pvt Ltd is committed to providing equal opportunity to its employees and strives to create a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. The Company firmly believes that every employee has the right to be treated with respect and dignity and endeavors to promote a gender-sensitive workplace and commits itself to removing underlying factors that contribute to a hostile work environment against women. Therefore, the focus of this Policy is directed to ensure zero tolerance toward verbal, or psychological conduct of a sexual nature by any employee that directly or indirectly harasses, disrupts, or interferes with another's work performance or that creates an intimidating, offensive, or hostile environment.

This policy is aimed at educating employees on their rights against any form of unwelcome sexual behavior and providing firm yardsticks that shall not be crossed while in employment with the Company. This Policy is made by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and forms a part of the Company's rules and regulations relating to employee conduct and discipline.





2. Scope

The scope of this policy extends to all employees of Radiant Polymers Pvt Ltd and applies to all the legal entities of Radiant Polymers Pvt Ltd. The policy is effective from 1st January 2024. The policy covers all employees on permanent rolls, temporary employees, trainees, employees on a contract, or employed through contractors and shall also include employees on deputation, apprentices, and consultants. It also includes visitors & vendors etc. whosoever are visiting company premises. The policy covers an alleged act of sexual harassment, whether the incident has occurred during or beyond office hours. Any place visited by the employee arising out of or during employment including transportation provided by the employer for undertaking such journey. Also covers an alleged act of sexual harassment, whether sexual harassment has taken place within or outside the company premises if either the victim or alleged harasser or both are traveling or deputed for company business. This policy is not applicable when both the alleged harasser & the victim are the third party.

3. Definition of Sexual Harassment

- a) "Sexual Harassment" includes any unwelcome acts or behavior of sexual nature (whether directly or by implication) and constitutes-
 - Physical contact and advances.
 - a demand or request for sexual favors, whether verbal, textual, graphic, electronic, or by any other action, sexually colored remarks, showing pornography, and any other

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unwelcome physical, verbal, or non-verbal conduct of sexual nature.



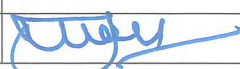
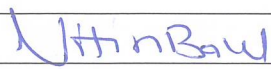
- Making obnoxious comments or utterances, remarks or jokes, letters, phone calls, messages or emails, gestures, stalking, sounds or display of nature with sexual overtures, sexual epithets, sexually explicit compliments, written.
 - or oral references to sexual conduct, gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity or deficiencies.
 - Displaying sexually suggestive objects, pictures, cartoons, displaying body parts, and showing pornography.
 - Engaging in any other unwelcome conduct of a sexual nature, which could be physical, verbal, or non-verbal, to make the other person uncomfortable, making offensive gestures/sounds.
- b) For an aggrieved to assess if certain conduct was indeed an unwelcome sexual act, the circumstances that surround such behavior should be assessed:
- Such as when demand or request for sexual favors in return for implicit/explicit promise of work-related preferential treatment such as performance appraisals, promotions, transfers, salary increases, and employment or any other form of reward or recognition; or
 - Implicit or explicit threat of detrimental treatment in her/his employment; or,
 - Implied or explicit threat about her/his present or future employment status; or
 - Interference with her/his work or creating an intimidating offensive or hostile work environment for her/his; or
 - Humiliating treatment likely to affect her/his health or safety.
- c) The definition of sexual harassment shall include any harassment caused to female employees.

4. General Terms used in this policy.

The following are some basic definitions for reference:

- a) Referred Act: shall mean The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- b) Complainant: The person reporting an incident of sexual harassment.
- c) Victim: The person subjected to Sexual Harassment.
- d) Alleged Harasser: The person who is alleged/reported to have committed an act of Sexual Harassment.

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e) Every employee must bear in mind that the above are merely indicators of sexual harassment and not an exhaustive explanation of its ambit.

If a person suspect being sexually harassed:

- **Speak Out:** Tell the accused, clearly and firmly, that his/her behavior is unwelcome and ask him/her to stop. Speaking out is an effective tool in combating harassment.
- **Gather Evidence:** Keep a record of all incidents (dates, times, messages, notes, locations, possible witnesses, what happened, and your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time.
- **Take Action:** File a complaint as soon as possible.

5. What are the key determining factors for a company investigation?

- a. The aggrieved should be a person who is authorized to be associated with the Company, including but not limited to regular, temporary, ad-hoc employees, consultants, and Executive / Management Trainees.
- b. The alleged accused should be a person under the control and supervision of the Company.
- c. There should have been an act of unwelcome sexual behavior falling within the ambit of 'Sexual Harassment.
- d. The alleged act of sexual harassment should have been committed in the Company premises or areas which can be termed as a notional extension of the Company premises such as Company transportation, Company Offsite, etc.




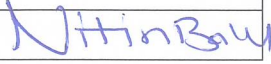
6. Where is the complaint to be filed?

The Company is determined to ensure that its employees are treated professionally and with the utmost safety. Any breach or threatened breach of this commitment will be taken up by the Company seriously to ensure justice and fair treatment to all. To not only set forth guidelines of professional behavior by way of this Policy but to ensure an effective mechanism of redressal of any grievance that may be faced by an employee while in employment with the Company, by the Act, the Company has set up the **Internal Committee ("IC")** and the details of members of IC are set out in Annexure "A".

7. Protection during the inquiry process

During the pendency of an inquiry, on a written request made by the aggrieved woman, the IC may recommend to-

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- a. Transfer the aggrieved or accused to any other location of work.
- b. Grant leave to the aggrieved for up to 3 (three) months (over and above the entitled leave).
- c. Grant such other relief to the aggrieved as may be prescribed.

8. Possible outcome of the investigation

- a. No action shall be taken if the allegation is not proved. Under such circumstances, the charges will be assessed as false or malicious.
- b. If the complaint is failed to be proved, the IC as applicable shall report to the management with the conclusion of the proceedings with no action to be taken.
- c. If the complaint is proved, the IC as applicable, shall report to the management with the conclusion of the proceedings and pass any recommendation for disciplinary action as it deems appropriate including but not limited to:
 - I. Written apology from the accused.
 - II. A letter of warning/reprimand or censure that will be placed in the personal file of the accused.
 - III. Immediate transfer or suspension without pay or both.
 - IV. Stoppage of increment with or without cumulative effect.
 - V. Withholding of promotion.
 - VI. Reduction in rank.
 - VII. Termination/dismissal from the services of the Company.
 - VIII. Filing a Complaint before the relevant police station/Court


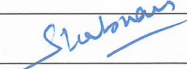

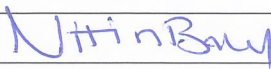
9. Assurance of Non-Retaliation

This Policy seeks to encourage all employees to express freely, responsibly, and in an orderly way views and opinions about any problem or complaints of Sexual Harassment. Regardless of the outcome of a complaint made in good faith, the employee lodging the complaint and any person providing information or witness will be protected from retaliation. While dealing with complaints of Sexual Harassment, the IC shall ensure that the complainant or the witness is not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory, or any other type of unethical behavior from the accused against the complainant, while the investigation is in progress, should be reported by the complainant to the IC as soon as possible. Disciplinary action will be taken by the IC against any such complaints which are found to be genuine.

10. Confidentiality

The Company will do everything consistent with the enforcement of this Policy and the law to protect the privacy of the individuals involved and to ensure that the aggrieved and the accused

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are treated fairly. Any information concerning the identity of the aggrieved or any parties involved, any information relating to conciliation and inquiry proceedings shall be kept strictly confidential and shall not be published or communicated in any manner whatsoever. Any person (including witnesses) who breaches confidentiality shall be subject to serious disciplinary action.

11. Investigation process


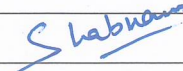

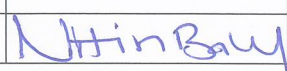
Every investigation will be conducted by the IC in a detailed, transparent, and effective manner based on the principles of natural justice. Every employee will be given equal treatment during the investigation process and any aggrieved is urged to take action for any legitimate complaint in the following manner:

- **Step 1:** An aggrieved can file a written complaint (6 copies) with the concerned IC within 3 (three) months of the last occurrence of the alleged incident of Sexual Harassment. However, the 3 (three) months period can be extended at the sole discretion of the IC for a further period of 3 (three) months. Any person can make a complaint on behalf of the aggrieved provided that the aggrieved has given her written consent to such complaint. If the complaint cannot be made in writing, any member of the IC will render all reasonable assistance to the aggrieved for making the complaint in writing. Along with a complaint, the aggrieved can choose to opt for a conciliation process wherein, if a settlement (except for monetary settlement) is arrived at, no further investigation process will be conducted by the IC as applicable, unless the alleged accused is not in compliance with the settlement terms.

- **Step 2:** In case no settlement is reached by conciliation, the IC will determine whether such a complaint will be investigated by the IC and shall proceed with an inquiry into the complaint by the principles of natural justice. The aggrieved may further refer the complaint to the IC for redressal if the terms of the settlement have not complied.

- **Step 3:** The IC will conduct a formal investigation based on the complaint and will arrive at the appropriate recommendation which shall be implemented by the management of the Company. During the investigation process, the IC as it may deem fit shall be entitled to request for the production and discovery of documents and/or summon and enforce the attendance of any person and examine such person under oath.




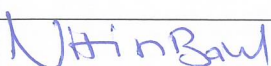
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Interim Relief: During an investigation process, the aggrieved shall be entitled to request the IC to recommend to the management for the provision of appropriate interim relief by the Act as set out herein below under Point 5 Protection during the Inquiry Process of the policy.

- **Step 4:** The Internal Committee will contact the Aggrieved Woman or the Aggrieved Person at the earliest, no later than three (3) working days from the date of receipt of a Complaint made in the Prescribed Manner. The Internal Committee may also contact the Respondent to obtain the Respondent's version.
- **Step 5:** Within five (05) working days of receipt of the Complaint, the Internal Committee will organize a Preliminary Meeting with the Aggrieved Woman or the Aggrieved Person to hear and record her/his allegations.
- **Step 6:** As soon as a Complaint is received, and within seven (07) working days from receipt of the written Complaint, the Internal Committee will send one (01) copy of the Complaint to the Respondent.
- **Step 7:** The Respondent will be required to file his/her written reply to the Complaint along with his/her list of documents and names and addresses of witnesses, if any, within a period not exceeding ten (10) working days from the date of receipt of the Complaint by the Respondent in the Prescribed Manner.
- **Step 8:** Immediately thereafter, within three (03) working days, the Respondent shall be asked to present his/her case before the Committee and an opportunity will be given to the Respondent for an explanation.
- **Step 9:** The Aggrieved Woman or the Aggrieved Person or the Respondent may also submit any further corroborative material with documentary proof, oral or written material, etc., to substantiate a Complaint at any stage before the Final Proceedings.
- **Step 10:** The Internal Committee may hold the preliminary proceedings in any Radiant Polymers Pvt Ltd Location or outside as it may deem proper.

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➤ **Step II:** The inquiry report shall be submitted by the IC to the employer as well as the parties.

The IC shall complete the inquiry within 90 (ninety) days.

12. Powers of the committee for the conduct of final Investigations.

For conducting the Final Investigation, the Internal Committee shall be entitled to exercise any of the below-referred powers, which shall be the same as are vested in a civil court when trying a suit in respect of the following matters:

- a. Summoning and enforcing the attendance of any person and examining him on oath.
- b. Requiring the discovery and production of documents; and
- c. Any other powers shall be informed from time to time.

13. Role of Internal Committee


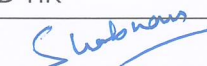

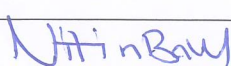
The Internal Committee will be responsible for the redressal of the complaint made by the victim and ensure time-bound treatment of the complaints as provided in the "Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013". The Internal Committee constituted will be appointed for 3 years.

The Committee (IC) shall consist of the following members:

1. The Presiding Officer shall be a woman employee employed at a senior level from amongst the employees at Radiant Polymers Pvt Ltd.
2. At least two (2) Members from amongst Employees preferably committed to the cause of women or, who have experience in social work or who have the legal knowledge
3. One (1) 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.
4. At least half of the total members (for this purpose members will include the Presiding Officer) of the Internal Committee so appointed should be women; and/or
5. In the event a complaint is received from Aggrieved Persons (not women), the Internal Committee may co-opt additional members on a case-by-case basis.

Prescribed Fees: The Member(s) appointed from amongst non-governmental organizations or associations committed to the cause of women, shall be paid fees and/ or allowances as may be prescribed under Applicable Law.

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14. Complaints made with malicious intent.

The Internal Committee has been constituted as a tool for our employees to have a forum to approach in the event of instances of sexual harassment to ensure them justice and fair play. However, if on investigation it is revealed that the complaint was made with malicious intent and with the motive of maligning the concerned individual / tarnishing his image in the company, and settling personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.


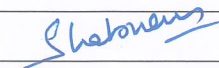
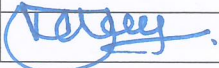
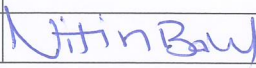
15. Submission of Annual Report under the Sexual Harassment Of Women At Workplace(Prevention, Prohibition And Redressal) Act,2013.

As per the Act, the Internal Committee of the organization must provide an Annual Report in the prescribed format to the District Magistrate Officer and employer during each calendar year. The Statutory Report shall provide the following information: (i) the number of Complaints on Sexual Harassment received during the year, (ii) the number of complaints disposed of during the year; (iii) the number of cases pending for more than ninety days; (iv) several workshops or awareness programs against sexual harassment carried out and (v) nature of action taken by Radiant Polymers Pvt Ltd.

16. Conclusion

In conclusion, the Organization reiterates its commitment to provide its women employees, with a workplace free from harassment and shall ensure that women employees are treated with dignity and respect

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ANNEXURE – “A”

DETAILS OF MEMBERS OF THE IC – NEW DELHI

Name	Organisation	Location	Email Id
Ms.Rinsey Singh(Presiding Officer)	Radiant Polymers Pvt. Ltd	New Delhi	hr@radiantindustries.in
Mrs.Neha Nathani(Member)	Radiant Polymers Pvt. Ltd	New Delhi	neha.nathani@radiantindustries.in
Mr.Vipin Kumar Singh(Member)	Radiant Polymers Pvt. Ltd	New Delhi	recruitments@radiantindustries.in
Mr.Arun Goel(Member)	Radiant Polymers Pvt. Ltd	New Delhi	arun.goel@radiantindustries.in
Mrs.Kusum Rana(Member)	Radiant Polymers Pvt. Ltd	New Delhi	kusum.rana@radiantindustries.in
Mrs.Deepti Pant(External Member)	Radiant Polymers Pvt. Ltd	Ghaziabad	deeptipantadv@gmail.com



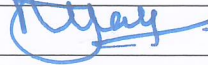
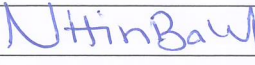
DETAILS OF MEMBERS OF THE IC – SAHIBABAD

Name	Organisation	Location	Email Id
Ms.Rinsey Singh(Presiding Officer)	Radiant Polymers Pvt. Ltd	New Delhi	hr@radiantindustries.in
Mrs.Shabnam Sahu(Member)	Radiant Polymers Pvt. Ltd	New Delhi	shabnam.sahu@radiantindustries.in
Mr.Sudheer Kumar Agnihotri(Member)	Radiant Polymers Pvt. Ltd	Sahibabad	sudir.agnihotri@radiantindustries.in
Mr.Vivek Sharma(Member)	Radiant Polymers Pvt. Ltd	Sahibabad	vivek.sharma@radiantindustries.in
Mrs.Deepti Pant(External Member)	Radiant Polymers Pvt. Ltd	Ghaziabad	deeptipantadv@gmail.com

DETAILS OF MEMBERS OF THE IC – GREATER NOIDA

Name	Organisation	Location	Email Id
Ms.Rinsey Singh(Presiding Officer)	Radiant Polymers Pvt. Ltd	New Delhi	hr@radiantindustries.in
Mr.Sankarsan Giri(Member)	Radiant Polymers Pvt. Ltd	Greater Noida	accounts.tr@radiantindustries.in
Mr.Gurpreet Singh Chamak(Member)	Radiant Polymers Pvt. Ltd	Greater Noida	gurpreet.singh@radiantindustries.in
Mr.Nitin Kumar(Member)	Radiant Polymers Pvt. Ltd	Greater Noida	purchase@radiantindustries.in
Mrs.Deepti Pant(External Member)	Radiant Polymers Pvt. Ltd	Ghaziabad	deeptipantadv@gmail.com

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DETAILS OF MEMBERS OF THE IC – RUDRAPUR

Name	Organisation	Location	Email Id
Ms.Rinsey Singh(Presiding Officer)	Radiant Polymers Pvt. Ltd	New Delhi	hr@radiantindustries.in
Mrs.Shabnam Sahu(Member)	Radiant Polymers Pvt. Ltd	New Delhi	shabnam.sahu@radiantindustries.in
Mr.Abhay Pratap Singh(Member)	Radiant Polymers Pvt. Ltd	Rudrapur	abhay.pratap@radiantindustries.in
Mr.Mohan Mahtoliya(Member)	Radiant Polymers Pvt. Ltd	Rudrapur	dispatch@radiantindustries.in
Mr.Abhishek Chauhan(Member)	Radiant Polymers Pvt. Ltd	Rudrapur	abhishek.chauhan@radiantindustries.in
Mrs. Jyoti Kulshrestha(External Member)	Radiant Polymers Pvt. Ltd	Rudrapur	jyoti.kulshrestha@gmail.com

DETAILS OF MEMBERS OF THE IC – VANI

Name	Organisation	Location	Email Id
Ms.Rinsey Singh(Presiding Officer)	Radiant Polymers Pvt. Ltd	New Delhi	hr@radiantindustries.in
Mrs. Minaxi(Member)	Radiant Polymers Pvt. Ltd	Vani	hr.u5@radiantindustries.in
Mr. Nitin Srivastav(Member)	Radiant Polymers Pvt. Ltd	Vani	production.u5@radiantindustries.in
Mr. Ashish Jha(Member)	Radiant Polymers Pvt. Ltd	Vani	ashish.jha@radiantindustries.in

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