



ROCKINGDEALS CIRCULAR ECONOMY LIMITED

**POLICY ON
PREVENTION
OF SEXUAL
HARASSMENT
AT
WORKPLACE**



1. POLICY:

- a. The Rockingdeals Circular Economy 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 work place or other than work place if involving employees is a grave offence and therefore, punishable.
- b. The policy is framed pursuant to enactment of The Sexual Harassment of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013. The policy is in addition to the Act.

2. SCOPE AND EFFECTIVE DATE:

- a) 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.
- b) Sexual harassment would mean and include any of the following:
 - unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
 - eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
 - act or conduct by a person in authority which creates an environment at the workplace hostile or intimidating to a person belonging to the other sex;
 - conduct of such an act at work place or outside in relation to an employee, or vice versa during the course of employment; and
 - any unwelcome gesture by an employee having sexual overtones
- c) **'Employee'** means any person on the rolls of the Company including those on deputation, contract, temporary, part-time or working as consultants.



3. COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “**Internal Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

4. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted Internal Complaints Committees for the Company where women are employed for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The composition of the Committee of the Company are given in **Annexure A**.

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

5. REDRESSAL PROCESS:

- a) 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/hersignature within three months of occurrence of incident.
- b) The Committee will hold a meeting with the Complainant within 10 days of the receipt of the complaint, but no later than two weeks in any case.
- c) At the first meeting, the Committee members shall hear the Complainant and record her/hisallegations. The Complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate his / her complaint. If theComplainant does not wish to depose personally due to embarrassment of narration of theevent, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- d) Thereafter, the person against whom the complaint is made may be called for a depositionbefore the Committee and an opportunity will be given to him or her to give an explanation, whereafter, an "Enquiry" shall be conducted and concluded.
- e) 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.
- f) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.



6. ENQUIRY PROCESS:

- a) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- b) 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 7 days of receipt of the same.
- c) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- d) If the Complainant or the person against whom complaint is made desires any witness/est to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- e) If the Complainant desires to tender any documents by way of evidence before the Committee, he/she 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.
- f) The Committee shall call upon all witnesses mentioned by both the parties.
- g) 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.
- h) The Committee shall complete the "Enquiry" within a reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Chairperson. The report of the committee shall be treated as an inquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- i) The Chairperson in consultation with Chairman and Managing Director will direct appropriate action in accordance with the recommendation proposed by the Committee.

7. OTHER POINTS TO BE CONSIDERED BY THE COMMITTEE:

1. The Committee may recommend to the Chairperson action which may include transfer or any of the other appropriate disciplinary action.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Committee shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The Committee shall analyze and put up a report on all complaints of this nature at the end of the year for submission to Chairperson,
5. In case the Committee finds the degree of offense 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.



8. AMENDMENT:

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.

Effective Date: This said Policy shall be effective from the date of listing of securities on stock exchange.



Annexure – A

Composition of Internal Complaints Committee

S.No.	Name of Member	Position
1	Mrs. Kulbir Chopra	Presiding Officer & Chairperson
2	Ms. Deepika Dixit	Member
3	Ms. Rajni	Member
4	Mr. Amit Sharma	Member
5	Mr. Shekhar Chauhan	External Member