

RELIABLE 	PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)	Effective From: 01-Nov-2024 Revision No.: 00 Policy Type: Internal
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1. BACKGROUND:

- 1.1. Reliable Autotech Pvt. Ltd. (hereinafter referred to as RAPL or the “Company” as per annexure 01) quest for competitive excellence comprises a commitment to lawful and ethical conduct and adhering to RAPL’s Core values, including Integrity, honesty, and respect for people.
- 1.2. The Company as a responsible corporate citizen, is committed to providing a safe and conducive work environment to all its employees and expects them to combine “Expertise with responsibility”. Towards this, it is essential that each employee deals with their colleagues, more particularly with female colleagues and third parties, with complete fairness and respect and realizes that his / her behavior will be attributed to the Company and can affect its inward and outward reputation.
- 1.3. Harassment of any kind, including sexual harassment, is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers their behavior to be acceptable and whether the harassed person has/had the opportunity to avoid the harassment.
- 1.4. RAPL is committed to providing a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of men and women at work.
- 1.5. The RAPL Prevention of Sexual Harassment Policy has been formed to prohibit, prevent and deter the commission of acts of sexual harassment at the workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.
- 1.6. This Policy shall also be governed by The Provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Hereafter referred to as “The Act”).

2. OBJECTIVE:

- 2.1. The Company believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than a workplace involving employees is grave misconduct and an offence under Indian Penal Code.

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3. SCOPE:

This Policy applies to all the employees and visitors of the Company.

4. DEFINITIONS & MEANING:

- 4.1. "Act" shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (including any amendment or any statutory enactment thereof) and shall also include rules framed there under.
- 4.2. "Aggrieved Employee" concerning a workplace shall mean any person, of any age, who alleges to have been subjected to any act of sexual harassment by the Respondent, whether or not employed with RAPL.
- 4.3. "Employees", for this Policy alone, shall mean persons on the role of the Company or as a trainee, apprentice, or deputation, temporary or part-time basis or working as consultants, including individuals engaged on a daily wage basis, either directly or through an agent, including a contractor and contract labour whether for remuneration or not, or working voluntarily or otherwise.
- 4.4. "Visitors" for this Policy shall include vendors, auditors, customers, or any outsider visiting the company premises.
- 4.5. "Internal Committee" shall mean an Internal Complaints Committee (ICC).
- 4.6. "Management" shall mean the Directors of the Company.
- 4.7. "Member" shall mean a Member of the Internal Committee.
- 4.8. "Presiding Officer" shall mean the Presiding Officer of the Internal Committee nominated under the provision of the Act.
- 4.9. "Respondent" means a person against whom the aggrieved employee has submitted a complaint.
- 4.10. "Sexual Harassment" shall mean to include one or more of the following acts directly or indirectly.
- 4.11. Physical contact and advances or A demand or request for sexual favors or sexually colored remarks or Showing pornography or any other unwelcome physical, verbal or nonverbal conduct of sexual nature.
- 4.12. "Workplace" means any department, plant, or corporate office of RAPL.

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5. PROCEDURE:

- 5.1. The Internal Complaints Committee (ICC) constituted by the Company is as under.
- 5.2. The Constitution of the Internal Complaints Committee (ICC) shall hold the office for such a period, not exceeding three years from the date of their appointment.
- 5.3. The Meetings of the ICC shall follow the provisions of the Act.
- 5.4. For this Policy, Management Committee includes the following key personnel of the Company:

Sr. No.	Committee Members	Role	Email	Contact Number
1	Mr. Devendra Bapat	Executive Chairman	devendra.bapat@reliableautotech.com	9823082151
2	Mr. Amol Chitnis	MD & CEO	amol.chitnis@reliableautotech.com	9823085262
3	Mr. Atul Borgaonkar	COO	atul.borgaonkar@reliableautotech.com	9922959861

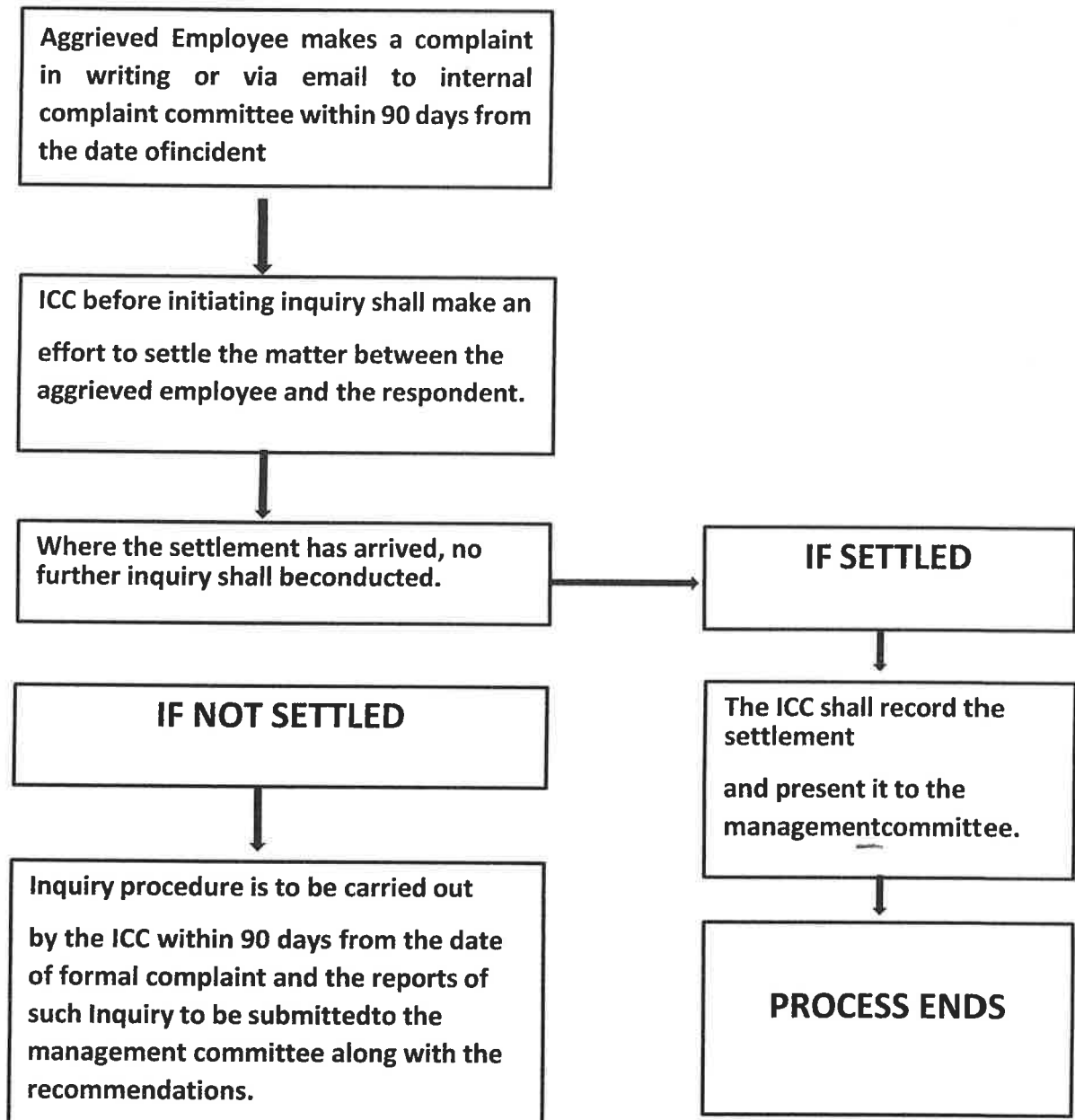
6. POLICY GUIDELINE:

- 6.1. The Company endeavors to ensure a friendly environment where all employees can work without any inhibition and contribute their best without fear, favour, or harassment.
- 6.2. The Policy on sexual harassment is aimed to supplying guidelines to prevent and/or redress sexual harassment of employees in the Company.
- 6.3. The Company recognizes that sexual harassment at workplaces violates their fundamental rights of gender equality, the right to life and liberty, and the right to work with human dignity guaranteed under Articles 14,15,19 (1) (g) and 21 of the Constitution.
- 6.4. To meet this objective, the Company takes necessary measures to avoid, eliminate and, if necessary, impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behavior (whether directly or by implication).
- 6.5. The extract of the penal provisions under the rules prescribed under the Act form a part of this Policy under Rules 9 & 10 of the said Rule 2013.

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7. COMPLAINT PROCEDURE - FLOW CHART



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Further, based on the recommendations made by the inquiry committee, a proper decision is to be taken by the management committee and executed the same.

8. DUTIES OF THE ICC:

- 8.1. An employee belonging to any location, in case of any misconduct, appropriate disciplinary action shall be initiated by Internal Complaints Committee (ICC) under the Policy where the conduct amounts to a specific offence under the Indian Penal Code or any other law; appropriate action shall be initiated in accordance with the law by making a complaint with the appropriate authority.
- 8.2. In case sexual harassment occurs due to an act by any third party or an outsider, Internal Complaint Committee will take steps necessary to assist the affected employee in support, preventive action and redressal.
- 8.3. To inquire, ICC shall have the same powers vested in a Civil Court under the Code of Civil Procedure, 1908, during the trial suit in respect of the following matters.
- 8.4. ICC shall have the power to Summon and enforce the attendance of any person and examine him on oath.
- 8.5. ICC can direct and ask for the discovery and production of documents; and any other matter which may be prescribed.
- 8.6. Transfer the aggrieved employee or the Respondent to any other workplace.
- 8.7. If needed and requested by the aggrieved employee, Management shall allow paid leaves in addition to the paid leaves applicable to the employee.
- 8.8. Grant such other relief to the aggrieved employee as may be prescribed.
- 8.9. ICC shall complete the enquiry within ninety days from the date of the formal complaint.
- 8.10. On the completion of the inquiry, the ICC shall provide a final report to the Management.
- 8.11. On the recommendation of the Internal Complaint Committee, the Management will take the decision and shall implement the same.
- 8.12. Where the Internal Complaint Committee arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Management that no action is required to be taken in the matter.

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8.13. Where the ICC arrives at a conclusion that the allegation against the Respondent is false or malicious or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the Management Committee to take action against the aggrieved employee or the person who has made the false complaint, in accordance with the provisions of service rules applicable to them.

8.14. The Internal Committee shall be governed by such rules as may be framed under the Act.

9. DUTIES OF THE MANAGEMENT COMMITTEE:

9.1. The Management Committee shall act upon the recommendation within Sixty days of receipt and inform the Internal Complaint Committee regarding the same in writing.

9.2. Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint made, the identity and addresses of the aggrieved woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and action taken by the Management, shall not be published, communicated or made known to the public, press and media in any manner.

9.3. Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

10. PANEL EXTRACT:

EXTRACT FROM THE RULES PERTAINING TO PENAL PROVISIONS PRESCRIBED UNDER - THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013.

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Rule – 9

Manner of taking action for sexual harassment: - Except in cases where service rules exist, where the Complaints Committee arrives at the conclusion that the allegation against the Respondent has been proved. It shall recommend to the employer or the District Officer, as the case may be, taking any action, including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the Respondent from service or undergoing a counselling session or carrying out community service.

Rule -10

Action for false or malicious complaint or false evidence:- Except in cases where service rules exist, where the Complaints Committee concludes that the allegation against the Respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer or District Officer, as the case may be, to take action under the provisions of rule 9.

The ICC committee mentioned in the policy will be common for following plants:

Annexure - I		
Plant	Address	Location
RACO & RAP 4	Plot No F-79/80, MIDC Ambad, Nashik – 422 010	Nashik
RAP 1	Plot No H-101/102, MIDC Ambad, Nashik – 422 010	Nashik
RAP 2	Plot No E-65 & E-65/1, MIDC Ambad, Nashik – 422 010	Nashik
RAP 3 & RA10	Plot No. C-2, Phase 1, MIDC Chakan, Pune – 410 501.	Pune
RAP 7	Survey Number 505/5/2 (S), Patwari Halka Number 41, Ward Number 27, Serial Number 591, Village Jetpura (Interior of Road from By-pass to Jetpura), Tehsil and District Dewas (Madhya Pradesh)	Devas
RAP 11	Plot No. PAP – V – 89, Phase 2, Vasuli, Tal – Khed, Dist – Pune – 410 501	Pune

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Annexure - II				
Pune				
Sr. No.	Committee Members	Role	Email ID	Contact Number
1	Ms. Sneha Agharkar	Presiding Officer	sneha.agharkar@reliableautotech.com	9860238882
2	Mr. Rahul Gadhe	Member	rahul.gadhe@reliableautotech.com	9922957034
3	Ms. Anuradha Badhe	Member	anuradha.bade@reliableautotech.com	7709666471
4	Adv. Aishwarya Dikshit	Independent Member (Advisor)	meetaish812@gmail.com	8007626096
Nashik				
1	Ms. Shabdaja Weldode	Member	shabdaja.weldode@reliableautotech.com	8530885678
2	Mr. Vikram Shinde	Member	vikram.Shinde@reliableautotech.com	9922433401
3	Adv. Ms. Sunita Lad	Independent Member (Advisor)	lad.sunita@gmail.com	9422252895

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Confidentiality:

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