Document Title: Policy on Protection of Women from Sexual Harassment (POSH)	Reliance Capital Limited
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Reliance Capital Limited

Policy on Protection of Women from Sexual Harassment (POSH)

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1. Introduction

1.1 Preamble

Reliance Capital Limited NBFC CIC ("Company") is committed to maintaining a work environment that is free from sexual harassment. This policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), the Companies Act, 2013, and relevant rules and regulations, including guidelines issued by the Reserve Bank of India (RBI) for Non-Banking Financial Companies (NBFCs). The Company believes that every employee has the right to work in an environment that promotes dignity, respect, and equality.

1.2 Objective

This policy aims to:

a) Prevent sexual harassment at the workplace.

b) Provide a mechanism for redressal of complaints of sexual harassment.

c) Ensure a safe and secure working environment for all employees.

1.3 Scope

This policy applies to all employees of the Company, including permanent, temporary, contractual, and trainee employees, as well as consultants, clients, and visitors, whether or not the harassment occurs within the Company's premises.

2. Definitions

2.1 Aggrieved Woman

"Aggrieved Woman" means a woman of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

2.2 Respondent

"Respondent" means a person against whom the aggrieved woman has made a complaint under this policy.

2.3 Workplace

"Workplace" includes:

a) All offices or branches of the Company.

b) Any place visited by the employee arising out of or during the course of employment, including transportation provided by the Company.

c) Any other place where the employee is present in connection with work-related activities.

2.4 Sexual Harassment

"Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether direct or implied):

a) Any unwelcome physical contact and advances.

b) A demand or request for sexual favors.

c) Making sexually colored remarks.

d) Showing pornography.

e) Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

3. Prohibition of Sexual Harassment

Sexual harassment is strictly prohibited. Any employee who engages in sexual harassment shall be subject to disciplinary action as per this policy and the applicable laws.

4. Internal Complaints Committee (ICC)

4.1 Constitution of the ICC

The Company shall constitute an Internal Complaints Committee (ICC) as required under the POSH Act. The ICC shall consist of:

a) A Presiding Officer who shall be a woman employed at a senior level in the Company.

b) Not less than two members from amongst employees, preferably committed to the cause of women or who have experience in social work or have legal knowledge.

c) At least one external member from a non-governmental organization or association committed to the cause of women or a person familiar with issues relating to sexual harassment.

4.2 Roles and Responsibilities of the ICC

The ICC shall:

a) Provide a neutral and impartial forum for hearing complaints of sexual harassment.

b) Conduct inquiries into complaints of sexual harassment in a timely manner.

c) Submit findings and recommendations to the management. d) Ensure confidentiality of the complaint and inquiry process.

e) Recommend appropriate action to be taken against the respondent, if necessary. f) Ensure compliance with the POSH Act and this policy.

5. Complaint Mechanism

5.1 Filing a Complaint

An aggrieved woman may make a written complaint of sexual harassment to the ICC within three months from the date of the incident or, in the case of a series of incidents, within three months of the last incident. The ICC may, for reasons to be recorded in writing, extend the time limit for a further period not exceeding three months. If the aggrieved woman is unable to make a written complaint, the Presiding Officer or any member of the ICC shall provide reasonable assistance to her for making the complaint in writing.

5.2 Inquiry Process

a) The ICC shall conduct a fair and impartial inquiry into the complaint, in accordance with the principles of natural justice. b) The respondent shall be given an opportunity to be heard and to present their case. c) The ICC shall have the right to summon and examine any person, if necessary. d) The inquiry shall be completed within a period of 90 days from the date of receipt of the complaint.

5.3 Interim Relief

During the pendency of the inquiry, the ICC may recommend to the management to:

a) Transfer the aggrieved woman or the respondent to another location. b) Grant the aggrieved woman leave of up to three months. c) Restrain the respondent from reporting on or evaluating the work performance of the aggrieved woman. d) Take any other appropriate measure to ensure that the aggrieved woman is not subjected to further harassment.

6. Action and Penalties

If the ICC concludes that the allegation of sexual harassment has been proved, it shall recommend to the management to take appropriate action against the respondent, in accordance with the Company's service rules and applicable laws. The penalties may include:

- Written apology
- Warning
- Reprimand
- Suspension
- Termination of employment
- Any other action as deemed appropriate

7. Confidentiality

The Company and the ICC shall ensure that the identity of the aggrieved woman and the respondent, and any information relating to the complaint and inquiry, is kept confidential, in accordance with the POSH Act.

8. Awareness and Training

The Company shall:

- Conduct regular awareness programs and training sessions for all employees on the provisions of this policy and the POSH Act.
- Display this policy in a conspicuous place in the workplace.

- Organize sensitization programs for members of the ICC.

9. Monitoring and Review

The ICC shall monitor the implementation of this policy and submit an annual report to the Board of Directors, as required under the POSH Act.

10. Policy Review and Amendment

This policy shall be reviewed periodically, and any amendments shall be approved by the Board of Directors.