

THE RUBY MILLS LIMITED

Sexual Harassment Policy

1. Preface:

RML 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.

2. Objective:

2.1. To create a healthy work environment

2.2. To create a mechanism to deter and address inappropriate sexual behaviour within the organization

3. Definitions:

3.1. Aggrieved

A person who is a victim of or claims to be a victim of sexual harassment.

3.2. Accused

A person against whom a complaint has been received by the complaints committee.

3.3. Sexual Harassment:

For this purpose, sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- a) Physical contact and advances;
- b) A demand or request for sexual favours;
- c) Sexually coloured remarks;
- d) Showing pornography;
- e) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Where any of these acts is committed in circumstances where-under the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work whether she/he is drawing salary, or honorarium or voluntary, whether in government, public or private enterprise such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory for instance when the person has reasonable grounds to believe that their objection would disadvantage them in connection with their employment or work including recruiting or promotion or when it creates a hostile work environment. Adverse consequences might be visited if the victim does not consent to the conduct in question or raises any objection thereto.

3.4. Complaints Committee:

RML will set up a complaints committee in accordance with prevailing laws and guidelines in order to assess, prevent and address acts of Sexual Harassment that occur within the organization.

4. Internal Complaints Committee:

4.1. Constitution:

The internal complaints committee shall be constituted by management in compliance with the laws and guidelines laid down by the competent authorities.

4.1.1. The committee shall consist of five members

4.1.2. The committee shall be headed by one member "chairperson" who shall compulsorily be a woman

4.1.3. More than half the members of the committee shall be women

4.1.4. In case of resignation / movement of any of the committee members a replacement shall be appointed by management

4.1.5. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a woman.

4.1.6. Internal Complaints Committee: List of Members

Sr.No.	Name	Designation	Gender
1.	Bertha R. Fernandes	Senior Employee-Chairman	Female
2.	R.N. Mehta	General Manager	Male
3.	Mayuri Wavdekar	Civil Advocate	Female
4.	Pravin Damani	Dy. Manager-Administration	Male

5. Grievance Redressal Process:

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

5.1. Informal Resolution Options

- 5.1.1. When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
- 5.1.2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, they can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

5.2. Complaints

- 5.2.1. Any person with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the aggrieved can send complaint through an email (bertha@rubymills.com). The aggrieved is required to disclose their name, department, division and location they are working in, to enable the Chairperson to contact them and take the matter forward.
- 5.2.2. The Chairperson of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, she will record this finding with reasons and communicate the same to the complainant.
- 5.2.3. If the Chairperson of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- 5.2.4. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- 5.2.5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Management as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Management will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

5.2.6. 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. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

7. Protection to Complainant / Victim:

The Company is committed to ensuring that no aggrieved who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

The Company may provide relief to the aggrieved who brings forth a complaint in keeping with the relevant laws and guidelines.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

Complaints Committee Contact Information:-

Sr.No.	Name	E-mail Id	Phone
1.	Bertha R. Fernandes	bertha@rubymills.com	022-24387809
2.	R.N. Mehta	mehta@rubymills.com	022-24387909
3.	Mayuri Wavdekar	mayuriw@rubymills.com	022-24387831
4.	Pravin Damani	pravind@rubymills.com	02192-395003