

**RDB INFRASTRUCTURE AND POWER LIMITED**  
*(FORMERLY KNOWN AS RDB REALTY & INFRASTRUCTURE LIMITED)*

**POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) OF  
WOMEN AT WORKPLACE**

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## 1. INTRODUCTION

This Policy (“Policy”) has been formulated by RDB Infrastructure and Power Limited (*Formerly known as RDB Realty & Infrastructure Limited*) (“the Company”) in compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and the rules framed thereunder (collectively referred to as “the Act”). While this Policy encapsulates the key elements and intent of the Act, in case of any ambiguity or requirement for further clarity, reference shall be made to the provisions of the Act, which shall take precedence.

At RDB Infrastructure and Power Limited, we are firmly committed to upholding the highest standards of ethics, transparency, and accountability in all our operations. In line with these core values, we have established governance frameworks that promote ethical behaviour, mutual respect, and dignity at the workplace. This Policy reflects our commitment to creating and sustaining a safe, inclusive, and respectful working environment that is free from all forms of discrimination and harassment, including sexual harassment.

Sexual harassment or any retaliatory act in connection with a complaint of sexual harassment is strictly prohibited and will not be tolerated under any circumstances. This Policy outlines the procedures for reporting, investigating, and addressing complaints in a fair and timely manner, in accordance with the applicable laws. The Company maintains a zero-tolerance approach toward any form of sexual harassment and will take strict disciplinary action, up to and including termination of employment, against any individual found in violation of this Policy. Similarly, any false complaint or intentional misrepresentation of facts during the investigation process will be treated as a serious breach and subject to appropriate disciplinary measures.

This Policy will be periodically reviewed and may be updated or amended by the Company as necessary, in line with legal requirements and organizational needs. The Company reserves the right to modify, rescind, or reinstate the Policy or any of its provisions at any time, at its sole discretion.

## OBJECTIVE

RDB Infrastructure and Power Limited strongly upholds the principle of equal opportunity employment and is committed to creating and sustaining a safe, inclusive, and dignified workplace for all. The purpose of this Policy is to:

- Prevent incidents of sexual harassment by fostering awareness and promoting respectful conduct at the workplace;
- Prohibit any unwelcome behaviour of a sexual nature that may affect an individual's dignity, safety, or work performance;
- Protect the rights of women and ensure that the workplace is free from intimidation, exploitation, or abuse;
- Provide a clearly defined process for lodging complaints, conducting fair inquiries, and ensuring appropriate resolution in a timely manner;
- Promote a work culture grounded in mutual trust, respect, and professional integrity;
- Extend protection not only to employees but also to any person interacting with the Company, including clients, partners, vendors and visitors.

The Policy is intended to reflect the Company's zero-tolerance stance on sexual harassment and ensure a responsive mechanism to deal with any such incidents effectively and confidentially.

### 3. SCOPE

This Policy is applicable to all employees of the RDB Infrastructure and Power Limited, irrespective of their nature of employment or designation. This Policy applies to a broad range of individuals associated with the Company, including the following categories:

- Permanent, temporary, contractual, consultant or daily wage employees;
- Interns, apprentices and trainees;
- Individuals directly or indirectly engaged by the Company and present at the workplace;
- Employees working with or without remuneration, including volunteers;
- Individuals whose terms of engagement may be expressed or implied.

The Policy also extends to clients, vendors, suppliers, visitors, consultants, and any other individuals who may be subjected to sexual harassment while interacting with the Company, whether within the Company's premises or during the course of any work-related engagement or assignment carried out on behalf of the Company.

The Company maintains a zero-tolerance policy toward sexual harassment by or against any individual. This includes conduct by third parties such as clients, business partners, service providers, or other external stakeholders. Any such behaviour will be treated with the same seriousness as if committed by an employee and appropriate action will be initiated as per the provisions of this Policy and applicable law.

### 4. DEFINITIONS

In this Act, unless the context otherwise requires,

- a) "Aggrieved person" means in relation to a workplace, an individual, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;
- b) "Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- c) "Employer" means any person responsible for the management, supervision and control of the workplace;
- d) "Internal Committee" means an Internal Complaints Committee constituted under Section 4 of the Act;
- e) "Member" means a Member of the Internal Committee;
- f) "Prescribed" means prescribed by rules made under the Act;
- g) "Presiding Officer" means the Presiding Officer of the Internal Complaints Committee nominated under sub-Section (2) of Section 4 of the Act;
- h) "Respondent" means a person against whom the aggrieved woman has made a complaint under Section 9 of the Act;

- i) “Sexual harassment” includes any one or more of the following unwelcome acts or behaviour whether directly or by implication) namely:
- i. physical contact and advances;
  - ii. a demand or request for sexual favours;
  - iii. making sexually coloured remarks;
  - iv. showing pornography; or
  - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- j) “Workplace” includes:
- i. Offices, factories, workshops, or any place where the Company conducts business;
  - ii. Fieldwork locations, client offices, construction sites and other off-site workspaces;
  - iii. Work-related social events, team-building activities, conferences, and seminars;
  - iv. Company-provided transportation (e.g., buses, cars, shuttles);
  - v. Work-related travel, including hotels, airports, trains, and flights;
  - vi. Digital platforms, such as emails, instant messaging, video conferencing tools and work-related social media accounts.
  - vii. Work-related training programs, workshops, seminars, and skill development activities;
  - viii. Work-related environments during business trips or while attending industry events; or
  - ix. Any other location whether in India or outside India.

## 5. PROCEDURES AND GUIDELINES

### 5.1 Composition of Internal Complaints Committee

In accordance with the relevant provisions of the Act, an Internal Complaints Committee (“ICC”) has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same.

The following shall be the composition of the ICC:

1. Presiding Officer: A woman employed at a senior level at workplace from amongst the employees in the organization or workplace.
2. At least two (2) members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge.
3. One (1) external 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. The Presiding Officer and every Member of the ICC shall hold office for a period of 3 (three) years, from the date of their nomination/date of approval of the Board. Further, subject to approval of the Board of directors (“the Board”), the committee may be reconstituted at any time and the policy shall be updated accordingly.

The details of the members of the ICC are provided in **Annexure A**.

## 5.2 Complaint of Sexual Harassment

1. Any aggrieved person may make in writing, a complaint of sexual harassment to the ICC members within a period of three (3) months from the date of incident and in case of more than one (1) incident, within a period of three (3) months from the date of last incident.
2. However, the ICC may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further three (3) months, if it is satisfied that bonafide circumstances prevented the aggrieved person from filing complaint within the time limit mentioned in point (1) hereinabove. The complaint should clearly mention the name and available details of both the aggrieved person and the respondent. Anonymous or pseudonymous complaints will not be investigated.
3. Where the aggrieved person is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, a complaint may be filed by:
  1. her/ his relative or friend;
  2. a special educator;
  3. a qualified psychiatrist or psychologist;
  4. a guardian or authority under whose care she/ he is receiving treatment or care;
  5. any person who has knowledge of the incident jointly with her/ his relative or friend or special educator or a qualified psychiatrist or psychologist or a guardian or authority under whose care she/ he is receiving treatment or care;
  6. her/ his co-worker;
  7. an officer of the National Commission for Women or State Women's Commission;
  8. any person who has the knowledge of the incident, with the written consent of the aggrieved person; or
  9. where the aggrieved person is dead, a complaint may be filed by any person who has the knowledge of the incident, with the written consent of her/ his legal heir.
4. On receipt of the Complaint, any ICC member will officially forward the complaint to the Presiding Officer of the ICC within seven (7) days from the date of making of complaint.

## 5.3 Redressal Process

### 5.3.1 Conciliation

Before the ICC initiates an inquiry, the aggrieved person may request the ICC to take steps to resolve the matter through conciliation, provided no monetary settlement shall be made as the basis of conciliation. If a settlement has been so arrived, the ICC shall record the outcome and forward it to the Company and provide copies of the settlement to the aggrieved person and the respondent. In such cases, no further inquiry shall be conducted by the ICC.

### 5.3.2 Manner of Inquiry into Complaint

1. In case where a settlement is not feasible or could not be arrived at through conciliation (ref clause 5.3.1 above), the ICC shall conduct an inquiry into the complaint. Additionally, an inquiry may also be initiated if the aggrieved person informs the ICC that any terms of settlement (as per clause 5.3.1 above) has not been complied with by the respondent.
2. The ICC shall, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent.

and where no such rules exist, in such manner as may be prescribed, forward the complaint to the police, within the seven (7) days, for registering the case under Section 79 of the Bharatiya Nyaya Sanhita, 2023.

3. The aggrieved person shall submit to the ICC, six (6) copies of the complaint along with the supporting documents and the names and addresses of the witnesses.
4. On receipt of complaint, the ICC shall send one of the copies received from the aggrieved person to the respondent within a period of seven (7) working days.
5. The respondent, within ten (10) working days of receiving the complaint shall file her/his reply to the complaint along with list of supporting documents, names and addresses of witnesses.
6. The ICC shall consider the reply from the respondent and initiate an inquiry. The aggrieved person or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the ICC. The ICC shall hear both the aggrieved person and the respondent on date(s) intimated to them in advance and the principles of natural justice shall be followed accordingly.
7. In the event of failure to attend personal hearing before ICC by the aggrieved person or the respondent on three consecutive hearings (intimated in advance) without sufficient cause, the ICC shall have the right to terminate the inquiry proceedings or give an ex-parte decision on the complaint. However, the ICC shall serve a notice in writing to the party (i.e.), fifteen (15) days in advance, before such termination or the ex-parte order announced.
8. In conducting the inquiry, a minimum of three (3) members of the ICC including the presiding officer or the chairperson, as the case may be, shall be present.
9. The inquiry shall be completed maximum within the period of 90 (ninety) days from the date of receipt of complaint.
10. The ICC shall submit a report along with its findings to the Company within ten (10) days of completion of inquiry.

### **5.3.3 Interim Relief**

During pendency of the inquiry, and basis on a written request made by the aggrieved person, the ICC may recommend to the Company to:

- a. transfer the aggrieved person or the respondent to any other workplace; or
- b. grant leave to the aggrieved person up to a period of three (3) months; or
- c. grant such other relief to the aggrieved person as may be prescribed;
- d. restrain the respondent from reporting on the work performance of the aggrieved person or writing her/ his confidential report, and assign the same to another officer;

*Note: On the recommendation of the ICC, the Company shall implement the recommendations and send the report of such implementation to the ICC.*

### **5.3.4 Manner of taking action for sexual harassment: -**

Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company to take 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.

### **5.3.5 Prohibition on disclosure of information**

This policy and the law prohibit any person including ICC Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings or recommendations of the ICC during the proceedings under the provisions of the Act.

### **5.3.6 Punishment for false complaints**

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the Company to take action against the aggrieved person or the person who has made the complaint in accordance with the provisions of the service rules applicable to her/ his on recommendations of the committee.

### **5.3.7 Appeal**

Any person, aggrieved from the recommendations made by the ICC or non-implementation of the recommendations of ICC, may prefer an appeal within a period of ninety (90) days of the recommendation to the court or tribunal in accordance with the provisions of the services rules applicable to the said person.

In case there is non-implementation of such recommendation may prefer an appeal to the appellate authority notified under clause (a) of section 2 of the Industrial Employment (Standing Orders) Act, 1946.

## **6. MANNER TO ORGANIZE WORKSHOPS, SEMINARS AND TRAINING PROGRAMMERS**

In accordance with the provisions of the Act, the Company shall:

- a. carry out orientation programmes and seminars for the members of the ICC;
- b. carry out employee awareness programmes and create forum for dialogues, at such places as the ICC may think fit;
- c. conduct capacity building and skill building programmes for the members of the ICC;
- d. declare the names and contact details of all the members of the ICC; and
- e. use modules developed by the State Governments to conduct workshops and awareness programmes for sensitising the employees with the provisions of the Act.

## **7. PREPARATION AND FILING OF ANNUAL RETURN**

The ICC shall in each calendar year, prepare in prescribed format, an annual report and submit the report to the Company.

The contents of the annual report shall be as under:

- a. number of complaints of sexual harassment received in the year;
- b. number of complaints disposed off during the year;
- c. number of cases pending for more than ninety (90) days; and
- d. number of workshops or awareness programme against sexual harassment carried out;
- e. nature of action taken by the Company.

## 8. CONFIDENTIALITY

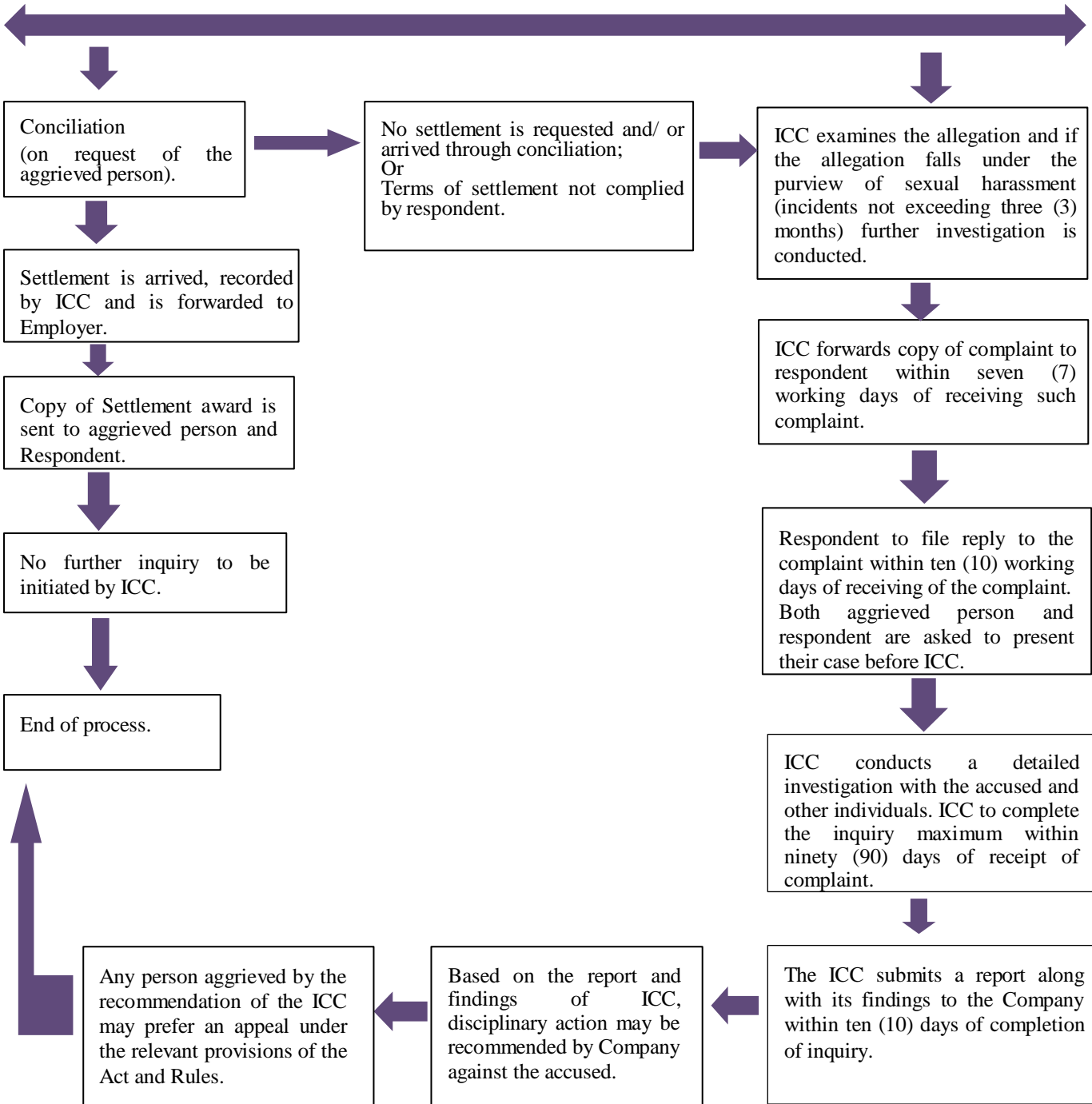
The identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the management shall not be published, communicated or made known to the public, press and proceedings media in any manner.

**Annexure-A**

<b>CONSTITUION OF INTERNAL COMPLAINT COMMITTEE (ICC)</b>	
<b>Name</b>	<b>Designation</b>
Ms. Pooja Jhavar	Presiding Officer
Mr. Rajeev Kumar	Member
Mr. Aman Sisodia	Member
Ms. Paromita Panda	External Member, being a person familiar with the issues relating to sexual harassment and knowledge of the law

**GRIEVANCE REDRESSAL PROCEDURE**

**ICC member will officially forward the compliant to the Presiding Officer of the ICC within seven (7) days from the date of making of complaint.**



## DO's AND DON'Ts

The below is only an indicative list of basic do's and don'ts and is in no way intended to be construed as an exhaustive list.

### Do's

- Be aware of the Prevention of Sexual Harassment Policy of the Company;
- Be aware of inappropriate behaviors and avoid the same;
- Say "No" if asked to go to places, do things or participate in situations that make you uncomfortable;
- Trust your instincts. Walk away from uncomfortable situations;
- Say "No" to offensive behavior as soon as it occurs;
- Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy;
- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

### Don'ts

#### Verbal harassment

- Sexually suggestive comments or comments on physical attributes;
- Offensive language that insults or demeans a colleague, using terms of endearment;
- Singing or humming vulgar songs;
- Requests for sexual favors, sexual advances, coerced acts of a sexual nature;
- Requests for dates or repeated pressure for social contact;
- Discussing sexual activities, sexual prowess or intruding on the privacy of an employees;
- Sexually colored propositions, insults or threats.
- Graffiti in the office premises.

#### Non-Verbal harassment

- Offensive gestures, staring, leering or whistling with the intention to discomfort another;
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by employees;
- Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace;
- Showing or mailing pornographic posters, internet sites, cartoons and drawings;
- Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

#### Physical harassment

- Physical contact or advances;
- Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching etc. that make others uncomfortable;
- Any displays of affection that make others uncomfortable or are inappropriate at the workplace.

**PROVISIONS/SECTIONS OF BHARATIYA NYAYA SANHITA, 2023**

Under the Bharatiya Nyaya Sanhita, 2023 (BNS), Section 75 directly addresses the offence of sexual harassment and classifies it as a cognizable offence, meaning a person accused may be arrested without a warrant.

According to Section 75 of the BNS, a man commits the offence of sexual harassment if he engages in any of the following acts:

- i. Physical contact and advances involving unwelcome and explicit sexual overtures;
- ii. A demand or request for sexual favours;
- iii. Showing pornography against the will of a woman;
- iv. Making sexually coloured remarks.

Punishment under Section 75 of BNS, 2023

- 1. For acts specified in clauses (i), (ii), or (iii):

The offender shall be punished with rigorous imprisonment for a term which may extend to 3 (three) years, or with fine, or with both.

- 2. For acts specified in clause (iv):

The offender shall be punished with imprisonment of either description (simple or rigorous) for a term which may extend to 1 (one) year, or with fine, or with both.

In addition to Section 75 of the BNS, certain acts of sexual harassment may also constitute offences under other provisions of the BNS, such as:

- Section 74 : Assault or use of criminal force to woman with intent to outrage her modesty;
- Section 77 : Voyeurism;
- Section 78 : Stalking;
- Section 63 and 64 : Rape and punishment for rape;
- Section 79 : Word, gesture or act intended to insult the modesty of a woman.

These provisions highlight the seriousness with which the law views offences related to sexual harassment and provide a robust legal backing for redressal and punishment.