



RBZ JEWELLERS LIMITED

POLICY ON PROHIBITION OF SEXUAL HARASSMENT AT WORKPLACE

RBZ Jewellers Limited

CIN: L36910GJ2008PLC053586

Registered Office:

Block-D, Mondeal Retail Park,

Near Rajpath Club, S.G.

Highway, Beside Iscon Mall,

Ahmedabad, Gujarat-380054, India

RBZ JEWELLERS LIMITED
POLICY ON PROHIBITION OF SEXUAL HARASSMENT AT WORKPLACE

(In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 – “POSH Act”)

1. INTRODUCTION

- a. RBZ Jewellers Limited, (CIN: L36910GJ2008PLC053586), a company registered under Companies Act 1956** having its registered office at **Block-D, Mondeal Retail Park, Near Rajpath Club, S.G. Highway, Ahmedabad, Gujarat- 380054, India**, is committed to creating and maintaining a work environment where all employees are treated with dignity and respect, free from any form of harassment, especially sexual harassment.
- b.** This Policy is framed in compliance with the POSH Act, 2013. While the Act primarily defines protection for women employees, RBZ Jewellers Limited. extends the principles of equality, fairness, and anti-harassment to all employees and stakeholders irrespective of gender, gender identity, or sexual orientation.
- c.** This policy applies not only to the physical workplace but also to virtual environments, including remote working, electronic communication, and social media platforms used for official work purposes.

2. OBJECTIVES

- a.** Ensure a safe and respectful workplace.
- b.** Prevent, prohibit, and redress any acts of sexual harassment.
- c.** Establish a transparent and fair complaint redressal mechanism.
- d.** Strengthen awareness and sensitivity among employees.
- e.** Ensure compliance with all legal provisions of the POSH Act, 2013.

3. APPLICABILITY

This Policy applies to:

- a.** Employees: All permanent, temporary, probationary, contractual staff, interns, trainees, apprentices, or volunteers.
- b.** Locations: Corporate office, factories, showrooms (Harit Zaveri Jewellers), client sites, off-site events, business travel, training, any other work/business places and digital/remote workplaces.
- c.** Third Parties: Vendors, customers, consultants, contractors, service providers, and visitors.

4. SCOPE

- a. Covers all interactions in workplaces and Provisions of Bhartiya Nyaya Sanhita, 2023 (BNS) included but not limited to, Sexual harassment (Sec. 75 of BNS), Assault or use of criminal force to woman with intent to outrage her modesty (Sec. 74 of BNS) , Assault or use of criminal force to woman with intent to disrobe (Sec. 76 of BNS), Voyeurism (Sec. 77 of BNS), Stalking (Sec. 78 of BNS) & Word, gesture or act intended to insult modesty of a woman (Sec. 79 of BNS) and other such provisions specified in the Law.
- b. Applies equally to in-person and online harassment, such as inappropriate WhatsApp messaging, video call misconduct, or social media misuse in a work context.

5. KEY DEFINITIONS (aligned with POSH Act, 2013)

a. **Sexual Harassment**

Any one or more of the following unwelcome acts/behaviors:

- Physical contact/advances.
- Demand/request for sexual favors.
- Sexually colored remarks.
- Showing pornography.
- Unwelcome physical, verbal, non-verbal, or digital conduct of sexual nature.

Extended to Digital Harassment:

- Sharing/displaying sexually explicit content in office or via digital channels.
- Sending inappropriate messages, images, videos, GIFs on WhatsApp/Slack/Teams etc.
- **Inappropriate or suggestive staring:** Prolonged or repeated staring in a way that is **unwelcome**, **makes the other person uncomfortable**, or is perceived as having **sexual intent**.
- **Cyberstalking, online bullying, or intimidation**, including persistent unwanted contact/calls or intrusive behavior through digital means.
- Sharing memes, jokes, or double-meaning commentary of sexual nature that creates hostile environment.

b. **Aggrieved Woman:**

Any woman, irrespective of whether she is an employee, who alleges to have been subjected to sexual harassment at the workplace.

(Note: Legally, the Act protects “women employees”. RBZ Jewellers Limited, however, voluntarily provides this safeguard to all genders).

c. **Workplace:**

Includes:

- All offices, factories, branches, showrooms, and external workspaces.
- Client sites, off-site meetings, conferences, training programs, exhibitions and any location visited during employment.
- Virtual work environments and digital platforms are used for work purposes.

d. Employer:

RBZ Jewellers Limited., represented by its Board/Management/Authorized Officers (KMPs).

e. Employee

Any person working at workplace, including via contractor, intern, trainee, temporary staff, with or without pay.

f. Internal Complaints Committee (ICC)

Committee formed under Section 4 of the POSH Act, with authority to receive and redress complaints.

6. ROLES & RESPONSIBILITIES

a. Employer:

- Maintain safe workplace.
- Constitute ICC at Head Office and branch units (factories/showrooms/offices).
- Organize training sessions every six months.
- Display POSH policy and ICC contacts at conspicuous places.
- Report complaint statistics annually to the District Officer.

b. Employees:

- Treat others with dignity and respect.
- Refrain from harassment, directly or indirectly.
- Report incidents promptly.
- Cooperate with ICC investigations.
- **Those who support or overlook sexual harassment are as much at fault as offenders; all the personnel** are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behavior go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to the ICC immediately.

c. Internal Complaints Committee (ICC)

- Receive complaints of sexual harassment.

- Conduct fair and confidential inquiries.
- Submit recommendations to the employer within 10 days of inquiry completion.
- Ensure no victimization or retaliation against the complainant.

7. COMPOSITION OF INTERNAL COMPLAINT COMMITTEE

(ANNEXURE-A)

a. Constitution

- Presiding Officer - Senior female employee of the company.
- 2 Members - Preferably with HR/Social work/legal expertise.
- 1 External Member - From NGO, legal, women's rights background **or** having knowledge regarding the specified laws.
- At least 50% Women members.

b. Term

- Maximum 3 years.

c. Quorum

- 3 Members including the Presiding Officer.

d. Removal of Members

- On breach of confidentiality, misconduct, conviction, or abuse of power.

8. RECORD KEEPING & DOCUMENTATION

- The ICC shall maintain proper records of all complaints, inquiries, actions taken, and correspondence.
- All documentation will be securely stored for a minimum period of **five years** after the closure of a case.

9. AWARENESS CAMPAIGNS

Regular awareness programs, workshops, and communication campaigns will be conducted to reinforce zero tolerance towards sexual harassment.

10. COMPLAINT REDRESSAL MECHANISM

a. Filing a Complaint:

- Complaints must be lodged within 3 months of the incident (extendable by ICC by 3 more months for genuine reasons, with valid proof).
- Complaints can be made:

- 1) In writing to ICC (email/hardcopy).
 - 2) Verbally (with help of ICC member to document it).
 - 3) Through HRMS/official employee portal (where available).
- If victim is unable to file due to physical/mental incapacity, complaint may be filed by relative, friend, co-worker, NGO, guardian etc.

b. ICC Inquiry Process:

- Copy of complaint sent to respondent within 7 working days of the filing.
- Respondent submits reply within 7 working days to the ICC.
- ICC conducts confidential inquiry, offering both parties an opportunity of being heard.
- Either party is absent for 3 consecutive hearings without valid reason, then ICC may proceed ex-parte.
- Conciliation option available only at request of complainant (no monetary settlement allowed).

c. Timelines:

- Inquiry must be completed within 90 days.
- Report submitted to employer within 10 days of inquiry completion.
- Employers must act on recommendations of IC committee within 60 days.

11. INVESTIGATION

Upon receiving the complaint, the ICC will initiate a fair, impartial, and confidential investigation.

12. CONCILIATION

The Internal Complaint Committee or The ICC may, before initiating an inquiry under section 11 and at the request of the aggrieved person, take steps to settle the matter between her and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

13. ACTIONS & PENALTIES

- a.** If allegations are proved, ICC may recommend:
- Written Apology.
 - Warning & Mandatory Counselling.
 - Demotion or Withholding promotion/increment.
 - Suspension or Transfer.
 - Termination of Employment.

- Deduction of compensation from salary to be paid to aggrieved person
- Compensation (as per Section 15, POSH Act).
- **Referral to Police under Section 75,76,77,78 & 79 of Bhartiya Nyaya Sanhita, 2023 (where applicable).**

14. FLASE & MALICIOUS COMPLAINTS

- If ICC concludes complaint was malicious/false with fabricated evidence, it may recommend disciplinary action against complainant (similar to respondent penalties).
- However, inability to substantiate a complaint does not make it false. Good faith complaints will not attract action.

15. POLICY REVIEW

- This policy will be reviewed periodically, at least once every **two years**, or earlier if there are changes in legislation or company structure.
- Feedback from employees and ICC members will be incorporated to improve effectiveness.

16. CONFIDENTIALITY

In accordance with Section 16 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the identities of the complainant, respondent, witnesses, and details of the inquiry proceedings shall be kept strictly confidential. Any breach of confidentiality is a violation of the Act and may attract penalties as prescribed under applicable law.

17. PROHIBITION OF RETALIATION

No victimization, intimidation, or disadvantage shall be caused to the complainant or witnesses. Any act of retaliation will be treated as separate misconduct.

18. ANNUAL REPORT

As per Section 21, ICC shall submit an Annual Report to the Board of Directors containing:

- Number of complaints received.
- Complaints disposed within year.
- Cases pending.
- Workshops/awareness sessions conducted.
- Nature of action taken.
- If there are no complaints, a NIL report will be filed.**

ANNEXURE-A

(Internal complaint committee members)

Sr. No.	Composition	Name	Designation	E-mail
1	Chairman	Mrs. Nidhi Junnarkar	HOD- Human Recourse	nidhi.junnarkar@rbzjewellers.com
2	Member	Mrs. Heli Garala	CS & HOD- Legal & compliance	heli.garala@rbzjewellers.com
3	Member	Ms. Shivani Parmar	DY Marketing and Branding Head	shivani.parmar@rbzjewellers.com
4	Member	Mr. Rajesh Pancholi	Chief Manufacturing Officer (CMO)	rajesh.pancholi@rbzjewellers.com
5	Member	Mr Parth Patel	Deputy Manager	parth.patel@rbzjewellers.com
6	Member	Mrs. Shuchi Verma	Corporate Design Head	shuchi.verma@rbzjewellers.com
7	External Member	Mr Rohan Shah	CA, LLB	rohan@vijayshahco.com