

# RADIANT FINANCIAL SERVICES LTD.

## Policy of the Company under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

### Objective

RADIANT FINANCIAL SERVICES LTD is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The Company will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment.

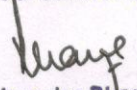
All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

We require all employees to make sure that they maintain mutual respect and positive attitude with regard towards one another.

### Definition of sexual harassment

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact and also mental harassment.
- b) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- c) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- d) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined in (a) above, may amount to sexual harassment:—
  - (i) Implied or explicit promise of preferential treatment at work; or
  - (ii) Implied or explicit threat of detrimental treatment at work; or
  - (iii) Implied or explicit threat about present or future employment status; or
  - (iv) Interference with work or creation of an intimidating or offensive work environment; or
  - (v) Humiliating treatment likely to affect health, safety or self-esteem.

For Radiant Financial Services Ltd.

  
Managing Director

# RADIANT FINANCIAL SERVICES LTD.

## Policy statement

- a) All employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All employees are required to maintain a work environment, which is free from any kind of harassment.
- d) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- e) All employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

## Procedure for dealing with complaints of sexual harassment

- a) If the person believes that she has been subjected to sexual harassment, then the complaint/grievance should be promptly reported to the Internal Complaints Committee (ICC).
- b) Ideally, the complaint should be lodged immediately or within a reasonable period.
- c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- d) An "Internal Complaint Committee" will be set up to deal with the complaint. A female employee will head the committee and not less than half of its members will be women, further to prevent any undue influence, the committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.
- e) The complaint committee will thoroughly investigate the complaint/ grievance and will take the necessary appropriate course of action.
- f) Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.



# **RADIANT FINANCIAL SERVICES LTD.**

- g) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.

## **Disciplinary Action**

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Sexual harassment will not be tolerated in the company. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behavior has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

## **Internal Complaint Committee (ICC)**

The committee will be chaired by a senior female Business Head.

In addition, the members would include two senior female employees, and an external executive from any NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

## **Confidentiality**

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the company shall not be published, communicated or made known to the public, press and media in any manner. All complaints/grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

## **Members of Internal Complaint Committee (ICC)**

The Internal Complaint Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women.



# RADIANT FINANCIAL SERVICES LTD.

The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) One member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

## Applicability

The Policy shall become operational from the date as may be decided by the Board of Directors of the Company.

Date: 31/01/2017

For Radiant Financial Services Ltd.

  
Managing Director