

PREVENTION OF SEXUAL HARASSMENT POLICY (POSH) AT WORKPLACE

Route Mobile Limited

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1. Introduction

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

The ‘Policy on Prevention of Sexual Harassment of women at workplace: Guidelines for Route Mobile Limited’ intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. The Board of the Company, at its meeting held on January 11, 2019, approved this amended policy pertaining to Prevention of Sexual Harassment at Work Place.

2. Objective

Route Mobile Limited (“RML”) is committed to creating a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. RML is dedicated to maintain an environment which is free from coercion and intimidation.

RML is fully committed to its obligation to eliminate sexual harassment at the workplace and shall adopt certain procedures and guidelines to govern cases against sexual harassment.

The procedure has been provided below in RML’s policy against sexual harassment (hereinafter referred to as the “Policy”).

All allegations of sexual harassment shall be taken very seriously by RML and shall be governed by this Policy.

This Policy extends to all employees of RML and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3. Definitions

- a) “Aggrieved woman”: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
- b) “Respondent”: A person against whom a complaint of sexual harassment has been made by the Complainant.
- c) "Complainant" means:
 - (i) for the purposes of the Act and the ICC procedures under this Policy: a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment, including contractual workers, temporary workers and visitors; and
 - (ii) for the purposes of the Company's general grievance and disciplinary procedure: any employee, irrespective of gender, who alleges to have been subjected to conduct of a sexually harassing nature.

Complaints by women under (i) shall be handled by the ICC in accordance with the Act and this Policy.

Complaints by persons other than women under (ii) shall be handled in accordance with the Company's general grievance procedure, with equivalent fairness, confidentiality, and protection against retaliation.

- d) "Employee: A person employed at the 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 by any other such name.
- e) "Sexual Harassment" shall mean and refer to any behavior (physical, verbal, written, graphic, electronic, emotional, psychological or through gestures that offend) which has been defined as inappropriate by the Policy, whether intentional or not, which offends the dignity of the person towards whom the behaviour is directed will be considered as sexual harassment and shall invite serious disciplinary action.

Sexual harassment would, inter alia, mean and include (whether direct or by implication) any of the following:

- a) unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any RML activity;
- b) advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person's private life or body, signs, insults or taunts based on sex, obscene communication, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- c) eve teasing, innuendos and taunts, unwelcome invitations to go out, suggestive comments or jokes, physical confinement against one's will and likely to intrude upon one's privacy;
- d) act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- e) conduct of such an act at work place or outside in relation to an employee of RML, or vice versa during the course of employment;
- f) any unwelcome gesture by an employee having sexual overtones;
- g) physical contact and advances;
- h) Staring, leering or unwelcome touching;
- i) any unwelcome sexual activity tied to employment decision or benefits; and
- j) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Behaviour that is based on mutual attraction, friendship and respect is not sexual harassment.

Sexual harassment shall also include conduct carried out through digital or electronic means, including through email, messaging applications (including instant messaging platforms used for work such as WhatsApp, Microsoft Teams, or Slack), social media platforms, video calls, or any other electronic communication medium, where such conduct occurs in connection with the complainant's employment or workplace relationship with the Company or the respondent.

4. Applicability

This Policy applies to all allegations of sexual harassment made by any employee of the Company against another employee irrespective of whether sexual harassment is alleged to have taken place at the Workplace (Workplace shall mean, in addition to the place of work [Head office / Branch offices,

Client office where an RML employee may be deputed etc. For the avoidance of doubt, "workplace" includes any location from which an employee performs work remotely — including their home or any other location — where the conduct alleged as sexual harassment arises out of or in the course of the employee's employment with or engagement by the Company or occurs through any communication medium used in connection with work, including email, messaging applications, video conferencing platforms, social media, or telephone). It shall also include any place where the aggrieved woman or the Complainant visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Route Mobile Limited, (including transportation provided for undertaking such a journey). All actions prohibited by this Policy are also applicable to all individuals who are on Company premises or on any other property where the Company conducts its business.

If an individual commits an act in violation of this Policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate against the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he or she had the authority to do so. The complainant needn't be of the opposite sex.

The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.

It may occur without economic injury to the complainant.

5. Constitution of Complaints Committee

Complaints of sexual harassment made by female employees shall be dealt with by the Internal Complaints Committee ("ICC").

- a) Annexure 1 of the Policy provides for constituent members of the ICC.
- b) The ICC should comprise a Chairperson (compulsorily woman), and not less than half of its members should be women.
- c) External member as mandated by law.
- d) In order to cover the various locations of Route Mobile Limited, additional members may be co-opted into the ICC as may be decided by the Management from time to time.
- e) The Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination.

6. Procedure for resolution, settlement or prosecution of Acts of Sexual Harassment:

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

- a) **Informal Resolution Options:** 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. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter. Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent if requested by the Complainant. It is made clear to all parties

that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared. In case a settlement is arrived at, the ICC shall record and report the same to RML for taking appropriate action. Resolution through conciliation should happen within a maximum of two (2) weeks of receipt of complaint. The ICC shall provide copies of the settlement to complainant and respondent. Once the action is implemented, no further inquiry shall be conducted.

- b) Complaints: An employee with harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, submitted within three (3) months from the date of the incident and in case of a series of incidents, within a period of three (3) months from the date of the last incident. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained. The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of three (3) months. Alternately, the employee can send complaint through an email to POSH@ROUTEMOBILE.COM. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward. Employees who wish to raise a concern relating to sexual harassment through the Company's vigil mechanism may do so in accordance with the Whistle Blower (Vigil Mechanism) Policy of the Company, through the channels specified therein. Such reports will be treated with strict confidentiality and handled in accordance with both this Policy and the Whistle Blower Policy. Complaint against any member of the Complaints Committee or employee in the management cadre should be sent directly to the Managing Director or CEO of RML. All such complaints shall be treated with strict confidentiality and handled in accordance with this Policy. If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.
- i. Legal heir, relative or friend;
 - ii. Co-worker; or
 - iii. Any person having the knowledge of the incident.
- c) The Presiding Officer 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 thirty (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 constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons, and communicate the same to the Complainant.
- d) If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
- e) 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.
- f) Manner of inquiry into complaint: a) Complainant should submit the complaint along with supporting documents and the names of the witnesses; b) Upon receipt of the complaint, the committee sends 1 copy of the complaint to respondent within 7 working days; c) Respondent

replies with all supporting documents within 10 working days of receiving the copy of the complaint

- g) In conducting the inquiry, a minimum of three committee members including the Presiding Officer shall remain present. The Presiding Officer may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without reason. 15 days' prior written notice shall be given to the absentee party, before termination or ex-parte order. All proceedings of the inquiry shall be documented.
- h) A copy of the final findings is shared with the complainant and the respondent to give them an opportunity to make a representation on the findings to the Committee.
- i) The ICC shall conduct such investigations in a timely manner and the Presiding Officer shall submit a written report containing the findings and recommendations on action to be taken to the management of RML as soon as practically possible and in any case, not later than ninety (90) days from the date of receipt of the complaint. The Presiding Officer, Head - Personnel & Administration and the MD of the Company will jointly take decision on the corrective action based on the recommendations of the ICC and keep the complainant informed of the same.
- j) Corrective action may include any of the following:
 - Formal apology
 - Counselling
 - Written warning to the Respondent and a copy of it maintained in the employee's file.
 - Change of work assignment / transfer for either the perpetrator or the victim.
 - Suspension or termination of services of the employee found guilty of the offence.
 - Where Sexual harassment occurs as a result of an act or omission of a third party, RML shall take all necessary and reasonable steps to assist the Complainant in terms of support and preventive action.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7. Inquiry Report

- a) The ICC shall provide a report of its findings to the Executive Committee within 10 (ten) days from date of completion of the inquiry.
- b) Where the ICC finds that no action is required to be taken, then it shall communicate the same to the Executive Committee.
- c) Where the ICC concludes that the allegation made by the complainant is true, it shall recommend to the Executive Committee:
 - To take action for sexual harassment as per the service rules or
 - To deduct from the salary of the employee as it may consider appropriate to be paid to the aggrieved woman.
- d) Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. Executive Committee shall act within 60 (sixty) days of receipt of recommendation from the ICC.

8. Manner of taking action against the Complainant

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman/man or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint. The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints. However, mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

9. Appeal

Any Complainant aggrieved by the decision of the ICC and implementation by the Executive Committee, may prefer an appeal in accordance with the Act and rules, within ninety (90) days of the recommendations being communicated.

10. Confidentiality

- a) Individuals involved in the complaints process/system should refrain from divulging the details of complaint/any information gathered by them in the course of the inquiry and the identities of the persons involved in the case should not be disclosed.
- b) RML shall recover a sum of INR 5,000 (Indian Rupees Five Thousand) as penalty from such person, as prescribed under the Act. In addition, where the breach of confidentiality is of a serious nature or causes harm to any party involved in the complaint, the Company reserves the right to initiate disciplinary action against the person responsible for such breach, up to and including termination of employment or engagement, without prejudice to any other remedy available under applicable law.

11. Duties of the Employer

- a) To provide safe working environment to all persons at the workplace;
- b) Display at any place in the workplace, penal consequences of sexual harassment;
- c) Organise workshops and training programs at regular levels;
- d) Provide necessary facilities to ICC and CC for dealing with complaints and conducting inquiries;
- e) Assist in securing attendance of respondents and witnesses before the ICC or CC;
- f) Provide assistance to a woman if she chooses to file a complaint under the Indian Penal Code or any other applicable law;
- g) Monitor timely submission of reports by the ICC;
- h) And any other assistance required by the ICC, CC or LCC for conducting inquiries into complaints made against sexual harassment.

12. Training, Awareness and Reporting

Mandatory Training

The Company shall conduct mandatory POSH awareness training for all employees:

- (i) as part of the induction programme for all new joiners, to be completed within thirty (30) days of joining; and
- (ii) as refresher training for all existing employees, at least once every financial year.

The Human Resources department shall maintain records of training completion and shall report completion rates to the Audit Committee on a yearly basis.

The Company shall ensure that ICC members receive specialised training on the requirements of the Act and best practices in investigation and inquiry, at least once every two years.

Awareness Obligations

The Company shall:

- prominently display at all workplaces (physical and on the Company intranet) the penal consequences of sexual harassment and the contact details of the ICC;
- circulate this Policy to all employees on an annual basis and upon any amendment; and include POSH awareness as a standing agenda item in at least one all-employee communication or town hall per year.

Quarterly Reporting to Management

The Presiding Officer of the ICC shall provide a quarterly report to the Head of Human Resources and the Compliance Officer, covering:

- the number of complaints received during the quarter (in aggregate, without identifying individuals);
- the status of pending inquiries;
- inquiries concluded during the quarter and, in aggregate, the nature of outcomes (substantiated / not substantiated / settled by conciliation); and
- any systemic concerns identified.

A quarterly summary of this report shall be placed before the Audit Committee and annual summary disclosed in the Annual Report, as required under the Act.

13. Amendments

The Company may amend the Policy as and when it deems necessary either pursuant to any change in law or otherwise. The Company shall be free to devise and implement any supplementary or other policies and guidelines in respect hereof for better implementation of this Policy. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Annexure 1- Current Constitution of the Internal Complaints Committee

The current composition of the ICC, as constituted by the Board of Directors/Management, is maintained in a separate Board resolution/management order, updated from time to time, a copy of which is available with the Company Secretary. The Company Secretary shall ensure that the ICC composition is reviewed and updated whenever any member ceases to hold the relevant position or upon expiry of their term.

The named composition of the ICC as at the date of this amendment is available from the HR department on request.