

**ANTI SEXUAL HARASSMENT POLICY
RESPONSE INFORMATICS LIMITED
Effective August 14, 2024**

Purpose

Response Informatics Limited (Response) strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Response will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Response will seek to prevent, correct and discipline behaviour that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, trainees, apprentices, part time or working as consultants.

Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Harassment includes, but will not be confined to the following:

Harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of the Company.

Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, colour, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping

Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, colour, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status

Sexual harassment

Sexual harassment is defined as "unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favour (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault

Courteous, mutually respectful, pleasant, non-coercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Internal Complaints Committee:

To consider and redress complaints of Sexual Harassment

- Presiding Officer :
- Member 1 :
- Member 2 :

One Member (Non-Government Organization):

Inquiry and Redressal Procedure:

Any employee who feels that she/he is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee or HR-Head in writing with her/his signature or by sending an e-mail at: cs@responseinformatics.com, within 10 days of occurrence of incident and not later than 3 months from the date of incident.

The committee shall initially try to resolve the issue through conciliation between the complainant & respondent.

In case of failure of the conciliation, the committee initiates the impartial investigation proceedings.

Both the parties would be given a fair opportunity to represent their versions along with the findings of the committee.

Within 7 days of receipt of the complaint, the Committee shall send one copy of the complaint to the person against whom complaint is made and give him an opportunity to submit a written explanation within 10 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es, whom they propose to call.

If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee she / he shall supply original copies of such documents. Both shall affix her/his signature on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both the parties.

The Committee shall provide every reasonable opportunity to the Complainant and to the respondent, for putting forward and defending their respective case.

The Committee shall complete the "inquiry" within reasonable period but not beyond one month and communicate its findings and recommendations to the Management to act upon.

The report of the committee shall be treated as an inquiry report on the basis of which the erring employee can be directly awarded appropriate punishment and ordering for payment of compensation.

The Management will direct appropriate action in accordance with the recommendation proposed by the Committee within a period of 60 days.

The Committee shall be governed by such rules as may be framed by the central Government or any other legislation enacted at a later date.

If the complaint is against the Superiors/co-employee the Management will ensure that the complainant is not discriminated/harassed in day-to-day work or during sanction of Leave/increment/promotion etc.,

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

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

Punishment for Sexual Harassment:

The Committee can impose the following penalties, which are indicative and not exhaustive on an employee who is found guilty of sexual harassment. These can be further classified as minor and major penalties, as follows:

Minor Penalties i.e., written warning

Major Penalties such as Withholding of performance-based pay awards and bonus, Withholding of Promotion/ Increment, Termination of service

Further, the employee may also be required to give a written apology to the complainant and upon his/her failure to do so, the penalty can be enhanced.

Criminal Proceedings:

In case the act under sexual harassment amounts to a specific offence under the the Indian Penal Code, 1860 / Bharatiya Nyaya Sanhita, 2023 or under any other applicable law, the Management shall initiate appropriate action, in accordance with law, by making a complaint with the appropriate authority.

Confidentiality:

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

Modifications and Review of the Policy:

The Committee reserves the right to modify and/ or review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align / alter the provisions of the policy to the extent deemed necessary by Committee from time to time.

Exceptions:

There are no exceptions to this policy.

Contact:

All queries and clarifications on the policy and procedures may be referred to the Human Resources Team of the Company