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

REPRO BOOKS LIMITED

Repro Books Limited

CIN – U22212MH2009PLC191532

11th Floor, Sun Paradise Business Plaza, B Wing, Senapati Bapat Marg, Lower Parel,
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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 Repro Books Limited (hereinafter referred to as “RBL”) 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.

Scope

RBL aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in RBL towards any other person being an employee of RBL, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

Applicability

This policy applies to all allegations of sexual harassment made by all employees of RBL against another employee at all locations 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 RBL employee may be deputed etc.]). 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 Repro Books 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 any other property where the company conducts its business.

- a) 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 employee 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.
- b) The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.
- c) It may occur without economic injury to the complainant.

Definitions

- a) **“Aggrieved Women”**: In relation to a workplace, a women, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

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- b) **“Respondent”**: A person against whom a complaint of sexual harassment has been made by the Complainant.
- c) **“Complainant”**: shall mean a women or a man who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
- 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, with or without the knowledge of the principle 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 behaviour (physical, verbal, written, graphic, electronic, psychological or through gestures and 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 RBL activity.
- b) Unwelcome sexual advances including verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, email, 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 during the course of employment;
- f) Any unwelcome gesture by an employee having sexual overtones;
- g) Physical contact and advances;
- h) Starting, leering or unwelcome touching;
- i) Any unwelcome sexual activity tied to employment decision or benefits; and Behaviour that is based on mutual attraction, friendship and respect is not sexual harassment.

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Constitution of Complaints Committee

Complaints of sexual harassment shall be dealt with by the Internal Complaints Committee (“ICC”).

- a) The ICC should comprise a Chairperson (compulsorily women), and not less than half of its member should be women.
- b) External member as mandated by law.

Complaint Mechanism

Whether or not a conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism, should be created in the Company for Redressal of the complaint made by the victim. Complaints related to sexual harassment can be notified to the ‘Internal Complaints Committee’ and/or can also be e-mailed to posh@reproindia.com

Complaints shall be made in writing either by an email or letter, within a period of 10 (ten) days of occurrence of incident and addressed it to any member of the Committee, directly by the person facing harassment. The Complainant shall state the date(s) and location of the alleged incident of harassment, sexual harassment or abuse of authority. Name of witnesses and/or proof, which may corroborate the allegation, could also be included in the complaint. Complaints should be made at the earliest and should state the facts and names of parties involved and witnesses, if any.

When a situation arises such that, neither the aggrieved women nor the legal heir/relatives/ other concerned notifies the complaint to the Internal Complaints Committee and the Internal Complaints Committee Members suspect that sexual harassment of a very serious nature has occurred; the Internal Complaints Committee is authorized to take suo-moto cognizance of such happening and initiate inquiry.

Procedures 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:

Filing of complaints:

- Any individual who holds a Repro Books Limited contract or has any professional dealing with the organization can approach any member of the ICC with a verbal or written complaint within 10 (ten) days of occurrence of incident. 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.
- A meeting of the ICC with the complainant shall be convened within 3 (three) days but no later than a week in after receipt of a complaint, to discuss the substance of the complaint and draw up a time-bound schedule for further process.
- At the first meeting, the Committee members shall hear the complainant and record his/her allegations. The complainant can also submit any corroborative material with a

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documentary proof, oral or written material, etc. to substantiate his/her complaint. If the complainant of event, a lady Committee member for lady employees involved and a male Committee member for male employees involved shall meet and record statement.

- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an enquiry shall be conducted and concluded.
- In case the complaint does not fall under the preview 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 the event of minimum three members of the ICC not being available for a meeting within the stipulated time limit, the co-coordinator shall be empowered to convene a meeting with those present and take immediate decisions on the further process.

Informal process (mediation):

- If judged appropriate, an informal process (discussion with both parties and mediation to resolve the issue) shall be attempted within one week of receipt of the complaint.
- In cases where the alleged offender accepts part or all of the substance of the complaint in the course of the informal process, the ICC may recommend appropriate disciplinary action.
- In cases where the informal process has been successful in resolving the grievance, the ICC shall close the case and initiate measures to prevent the recurrence of the situation that generated the complaint.
- In cases where the informal process reveals prima facie evidence of gross sexual misconduct, the ICC may decide to institute a formal enquiry even if the complainant is satisfied with the informal process.

Formal Process (Investigation):

- In cases where an informal approach is deemed inappropriate, or is tried and fails to resolve the issue, a formal investigation shall be instituted within 15 (fifteen) days of the receipt of the original complaint. The complainant and the alleged offender shall be informed of the initiation of the formal process and asked to cooperate. If the initial complaint was made verbally, it will be taken in writing at this stage.
- The complainant shall be asked to submit a written statement with details of the alleged incident(s) of harassment, with supporting evidence and names of persons who can provide corroboration
- The alleged offender shall be informed in writing of the substance of the complaint. Depending on the nature of the complaint and the particular circumstances of the case, the alleged offender shall be requested to respond either in writing or orally to the ICC, which shall record the response.
- The alleged offender shall also be asked to submit documentary or other evidence in refutation of the complaint.

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- In the course of investigating the complaint, the ICC shall conduct interviews with and cross-question the complainant, the alleged offender and any other individuals who can provide information in support of, or in refutation of, the complaint.
- The Committee may also examine documents, including confidential files and records pertinent to the case, if required.
- The proceedings of the investigation and the deliberations of the Committee shall be documented. The complainant (or a person nominated by the complainant as an observer) shall have the right to remain present during the depositions by the alleged offender and witnesses. Transcripts of the depositions may be made available in cases where the complainant chooses not to exercise the right to be present.

Report and recommendations:

- At the close of the investigation, the Committee shall submit a report in writing, stating their findings and recommending the appropriate course of action to the management of the Company.
- Barring extraordinary circumstances, the process of enquiry shall be completed within thirty days of the receipt of the complaint. Any delays shall have to be explained in writing to the complainant, the alleged offender and the management of the Company. If cases where the alleged offence cannot be proved, or where the offence does not merit disciplinary action, the investigation report shall include recommendations for steps to be taken to prevent the recurrence of similar incidents in the future.

Disciplinary action:

- In all cases where the offence is proved to have been committed and disciplinary action is recommended by the ICC, the management shall, within a week of submission of the report, take appropriate disciplinary action against the offender.
- In cases where the complaint is found to be false and motivated, the ICC may initiate disciplinary action against the complainant and others who are proved to have provided false information or concocted evidence.
- In cases where disciplinary action has been taken, a brief report with details of the offence, the investigation findings and the action taken shall be shared with all staff members without disclosing the name of the complainant and the offender.

Appeal

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

Confidentiality

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. Any breach of confidentiality will be taken

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seriously and the implications of which shall be disciplinary actions as per the rules of the RBL.

Amendments & Updates

The policy will be reviewed from time to time and revised to keep it up to date with changes in state acts and employment policies. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be formally communicated to all the Employees.

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