



**Global Policy on  
Prevention of  
Sexual  
Harassment**



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Compliance Department*

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## Our Commitment

We, at Redington Group (“**Redington**”), are always committed to ensure equality and gender justice, dignity at the Workplace (*as defined below*), through our interventions and practices, which includes prevention of Sexual Harassment (*as defined below*) at the Workplace.

This policy on Prevention of Sexual Harassment [POSH] (“Policy”) is a gender-neutral Policy and therefore covers Sexual Harassment of a person of any gender by a person of any gender.

Redington is committed to provide a safe working atmosphere at the Workplace which shall include:

- Safety from the persons coming into contact at the Workplace;
- Displaying at any conspicuous place in all the branches/offices (in addition to the upload of this Policy on Redington's intranet), this Policy, which details the penal consequences of Sexual Harassment and the entire process enumerated herein to.

All employees should take the time to ensure they understand what types of behaviour are unacceptable under this Policy and how Redington will handle complaints of Sexual Harassment. Ignorance of the Policy will not be a valid defense in case of any non-compliance or violation thereof. Please note that while the Policy covers all the key aspects of local legislations on Sexual harassment, for any further clarification, reference shall always be made to the respective legislation and in case of any conflict or contradiction, the more stringent provision between the two will apply.

## Scope

This Policy is applicable to the workforce of Redington, whether employed on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of Redington, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes the management representative, a co-worker, probationer, contract worker, trainee, apprentice or called by any other such name (each, a "Company Personnel")

## Definitions

- a. "Sexual Harassment" includes any one or more of the following unwelcome acts or circumstances in relation to any sexually determined act or behavior (whether directly or by implication):
  1. Any unwelcome sexually determined behavior, or pattern of conduct, that could cause discomfort and/or humiliate a person of any gender at whom the behavior or conduct was directed, namely:
    - i. physical contact and advances; or
    - ii. a demand or request for sexual favors; or
    - iii. making sexually colored remarks; or
    - iv. showing pornography; or
    - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
  2. 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, may amount to sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment; or
  - ii. implied or explicit threat of detrimental treatment in their employment; or
  - iii. implied or explicit threat about their present or future employment status; or
  - iv. interference with their work or creating an intimidating offensive or Hostile Work Environment (*as defined below*) for them; or
  - v. humiliating treatment likely to affect their health or safety.
3. It would also include any other sexually oriented behavior, whether it is intended or not, which is unwelcome and has the effect of creating a work environment which is offensive, intimidating, or humiliating to a Company Personnel of any gender.
4. Some instances of sexual harassment:
  - i. actual or attempted rape or sexual assault; or
  - ii. unwanted pressure for sexual favors; or
  - iii. unwanted deliberate touching, leaning over, cornering, or pinching; or
  - iv. unwanted sexual looks or gestures; or
  - v. unwanted letters, telephone calls, or materials of a sexual nature; or
  - vi. unwanted pressure for dates; or
  - vii. unwanted sexual teasing, jokes, remarks, or questions; or

- viii. hugging, kissing, patting, or stroking; or
- ix. touching or rubbing oneself sexually around another person. Standing close or brushing up against a person; or
- x. sexually suggestive signals; or
- xi. facial expressions, winking, throwing kisses, or licking lips; or
- xii. making sexual gestures with hands or through body movements.

The above list is not comprehensive in nature and is just indicative of what can be construed as Sexual Harassment.

- b. Creating a “Hostile Work Environment” means, by way of example:
  - 1. Creating a Workplace where Sexual Harassment may go unheeded; where despite complaints no action is taken; where discriminatory job assignments are encouraged or tolerated, where there is nexus between the Respondent (*as defined below*) & higher management, and where the Aggrieved Person (*as defined below*) may be placed under fear, disadvantage or threat of victimization.
  - 2. It will also mean related retaliation which includes marginalizing someone in the Workplace with regard to their roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.
  - 3. Misusing ones position of authority and/or trust, to inappropriately impose oneself or try to impose

oneself for demanding sexual favours, be it by way of looks, physical contact, inappropriate conversation in the presence of the individual, inappropriate communication by way of e-mail / phone call / SMS or any other oral or written form of communication.

- c. “Aggrieved Person”, in relation to a Workplace, would include any Company Personnel (of any gender) and any third party or an outsider, who is a victim of Sexual Harassment as a result of an act by a Company Personnel during the course of employment or rendering of service at Redington’s Workplace.
- d. “Complainant” means the person who lodges the complaint, who could be the Aggrieved Person or their legal heir, co-worker, any person having the knowledge of the incident or any persons as mentioned under the Act.
- e. “Respondent” means a person against whom the Aggrieved Person or the Complainant has made a complaint.
- f. “Workplace” for the purposes of this Policy includes (i) wherever Redington carries its operations including all offices and off-sites of Redington; (ii) Company sponsored events and places visited by Redington Personnel, where services are rendered or arising out of or during the course of employment or engagement, as the case may be, including transportation provided by Redington for undertaking such journey; and (iii) any digital platforms such as Microsoft Teams, Zoom, Skype, Cisco Webex, etc., or any official page of Redington or any social media platform such as LinkedIn, Instagram, Facebook, Twitter etc., utilized by any Company

Personnel, in the course of their employment or engagement with Redington.

### **Procedure for dealing with complaints of misconduct/ Sexual Harassment**

1. Any Aggrieved Person may, in the first instance, send an email to [poshicc@redingtongroup.com](mailto:poshicc@redingtongroup.com) to file a complaint of Sexual Harassment at Workplace to the Internal Complaints Committee (herein after referred to as IC) so constituted, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
2. The details of the members of the IC are on Redington intranet and may also be obtained from the HR department.
3. The IC shall consist of the following members:-
  - a. At least two employees, preferably committed to the cause of women and/or who have had experience in social work or have legal knowledge; and
  - b. One Female Employee- member -Presiding Officer; and
  - c. A coopted external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment such as persons who could be lawyers/ social workers- member, shall be common for all the ICs across Pan India Locations/Hub of locations.



4. The members of the IC as mentioned above, shall hold office for such period, not exceeding three years, from the date of their nomination.
5. At least one half of the members of the IC will be women.
6. Based on the nature/ gravity/ complexity of the complaint, Redington reserves the right to appoint additional member(s) on the panel of the IC, to address any specific nature of complaints.

### **Pre-Enquiry Process**

1. The Aggrieved Person shall submit a formal complaint along with necessary supporting documents to any member of the IC through the below-mentioned reporting channels.

**Email:** [poshicc@redingtongroup.com](mailto:poshicc@redingtongroup.com)

**Write to:** Internal Complaints Committee  
C/o Global Chief Commercial Officer  
Redington Limited  
Block3, Plathin, Redington Tower,  
Inner Ring Road, Saraswathy Nagar West,  
4th Street, Puzhuthivakkam,  
Chennai TN 600091

**Call helpline:** India – 000 800 4401 256

MEA – 0120 921 067

Turkey – 00 800 4488 20729

**Log on to:** [safecall.co.uk/report](http://safecall.co.uk/report)

2. The IC, may, before initiating an inquiry into the complaint and at the request of the Aggrieved Person, take steps to settle the matter between them and the Respondent through conciliation.
3. However, no monetary settlement shall be made as a basis of conciliation.

4. Where a settlement has been arrived at, the IC shall record the settlement so arrived and forward the same to Global HR Head to take action as specified in the settlement.
5. The IC shall provide the copies of the settlement as recorded to the Aggrieved Person and the Respondent.
6. Where a settlement is arrived, no further inquiry shall be conducted by the IC.
7. If no settlement has been arrived or where the Aggrieved Person informs the IC, that any term or condition of the settlement arrived at has not been complied with by the Respondent, the IC shall arrange to make inquiry into the complaint in accordance with the provisions of the terms and conditions of employment, treating this as misconduct.
8. When the decision is taken to inquire into the complaint, the Aggrieved Person will be advised by the IC about the time/ date of the meeting of the IC.

### **Action during pendency of inquiry**

1. During the pendency of an inquiry, on a written request made by the Aggrieved Person, the IC, may recommend the HR department of Redington, in consultation with the management, to take actions in relation to the complaint, such as:
  - i. Suspension of the Respondent; or
  - ii. Transfer the Aggrieved Person or the Respondent to any other workplace; or
  - iii. Grant of leave to the Aggrieved Person up to a period of three months; or

- iv. Grant of such other relief to the Aggrieved Person as may be prescribed in the Rules.
2. The leave granted to the Aggrieved Person in this Policy shall be in addition to the leave they would be otherwise entitled.
3. On the recommendation of the IC, the Global HR Head, in consultation with the management, shall implement the recommendations made and send the report of such implementation to the IC.

### **Enquiry Process**

1. The IC will ask the Aggrieved Person to prepare a detailed statement of incidents basis which the Aggrieved Person has submitted the complaint.
2. Such statement shared by the Aggrieved Person shall be sent to the Respondent within a period of seven working days.
3. The Respondent will be asked to prepare a response to the statement of the Aggrieved Person and submit the same to the IC within a maximum of ten working days.
4. The statements and other evidence obtained in the inquiry process will be considered strictly confidential.
5. The IC will organize verbal hearings with the Aggrieved Person and the Respondent, in some cases independently also if warranted.
6. The IC can pass ex-parte orders/ terminate the proceedings if the Aggrieved Person or the Respondent does not appear before the IC on three consecutive hearings without sufficient cause, by giving a notice at least fifteen days in advance before the intended date of termination/ ex-parte orders.

7. In case of fear of intimidation from the Respondent, the statement of the Aggrieved Person, during the investigation, may be recorded in absence of the Respondent.
8. The IC will take testimonies of other relevant persons and review the evidence wherever necessary. The IC should ensure that sufficient care is taken to avoid any retaliation against the witnesses.
9. During the inquiry process, the Aggrieved Person and the Respondent would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
10. For the purpose of making an inquiry under this provision, the IC shall have the powers for (do note that these powers may only be exercised for making an inquiry in matters which involve the persons who are protected by the Act):
  - summoning and enforcing the attendance of any person and examining him on oath;
  - requiring the discovery and production of documents;
  - Any other matter which may be decided and prescribed.
11. The IC will arrive at the decision after carefully, objectively and fairly reviewing the circumstances, evidence and relevant statements.
12. The IC will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint that both the parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents.

13. The IC will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimised nor discriminated against while dealing with a complaint of misconduct or Sexual Harassment.
14. The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.
15. The IC will investigate and complete the inquiry within a period of ninety days and prepare an inquiry report with recommendation of action to be taken by the HR Head in consultation with the management.
16. On the completion of an inquiry, the IC shall provide a report of its findings to the HR Head, within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties. The HR Head in consultation with the management shall take action as early as possible but within maximum of sixty days, from the date of the recommendation being provided by the IC.
17. The parties may make representation within seven days from the date of receipt of the report before the IC.

### **Enquiry Report and Action thereon**

1. Where the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Global HR head that no action is required to be taken in the matter.
2. Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it has powers and shall recommend to the HR Head:-

- i. To take action in accordance with the provisions of the terms of employment of service, treating Sexual Harassment as misconduct.
  - ii. To specify any specific action to be taken against Respondent notwithstanding the terms and employment, which may include one or more of the following: (a) censure; (b) warning; (c) fine; (d) loss of pay; (e) loss of seniority; (f) termination of employment, with or without notice or any compensation in lieu of notice; (g) appropriate legal proceedings; (h) written apology; or (i) any other action that the management of Redington may deem fit.
  - iii. To deduct, notwithstanding anything in the terms of employment applicable to the Respondent, from the salary of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Person or to their legal heirs, as it may determine.
  - iv. In case of inability to make such deduction from the salary of the Respondent due to their being absent from duty or cessation of employment, it may direct to the Respondent to pay such sum to the Aggrieved Person.
  - v. In case the Respondent fails to pay the sum fined as per above, the IC may take necessary actions for the recovery of the sums due to them.
3. The Global HR head shall, in consultation with the management, act upon the recommendation and report the same to the IC.
4. This Policy shall not, however, be used to raise frivolous or malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing

evidence, disciplinary action will be taken against the person raising such false complaint.

5. Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Aggrieved Person or any other person making the complaint has made the complaint knowing it to be false or the Aggrieved Person or any other person making the complaint has produced any forged or misleading document, it may recommend to the HR head, to take action against the person who has made the complaint, in accordance with the terms and conditions of employment or any specific action and in such manner as it may prescribe.
6. That said, a mere inability to substantiate a complaint or provide adequate proof would not attract action against the Aggrieved Person.
7. Further, the malicious intent on part of the Aggrieved Person shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.
8. Notwithstanding anything contained in any of the statutes or provisions of law, the contents of the complaint made under this Policy, the identity and addresses of the Aggrieved Person, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC, and the action taken by the HR Head in consultation with the management, in accordance with this Policy shall not be published, communicated or made known to any employees or to the public, press and media in any manner.
9. However the information may be disseminated regarding the justice secured to any victim of Sexual Harassment

under the Act and this Policy, without disclosing the name, address, identity or any other particulars calculated which shall not lead to the identification of the Aggrieved Person and witnesses.

10. Any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of the Act and this Policy, contravenes such provisions, he/she shall be liable for penalty in accordance with the provisions of the terms and conditions of employment applicable, treating this as misconduct.
11. In addition to the penalties attracted for misconduct under the Act or the Policy, any person breaching the confidentiality requirement, shall be liable for action as per this Policy and/or internal policies of Redington in this regard and/or applicable laws.
12. Any party to the complaint, dissatisfied with the actions taken for resolution of the complaint, can file an appeal to the local authorities in accordance with the local legislations. If an employee has any doubt regarding the appropriate authority , he / she may reach out to the IC committee members directly through mail to [poshicc@redingtongroup.com](mailto:poshicc@redingtongroup.com) to identify appropriate authority for appeal.
13. If the local legislations are silent about the provision relating to the appeal, then the dissatisfied party can request for a fresh inquiry involving the HR geography head and a member of IC who was not involved in the earlier inquiry process, through mail to [poshicc@redingtongroup.com](mailto:poshicc@redingtongroup.com)
14. The IC shall also in each calendar year prepare, an annual report in the prescribed format, and submit the same to Redington and the District Officer.



## Duties and Responsibilities of HR Head under this Policy

1. Display at any conspicuous place in the Workplace, this Policy;
2. Ensure setting up of the IC as referred to in this Policy;
3. Providing training to employees on this policy
4. Provide necessary facilities to the IC, for dealing with the complaint and conducting an inquiry;
5. Assist in securing the attendance of Respondent and witnesses before the IC;
6. Make available such information to the IC, as it may require having regard to the complaint made under this Policy;
7. Ensure treating Sexual Harassment as a misconduct under the terms and conditions of employment and initiating action for such misconduct;
8. Monitor the timely conduct of the meetings of the IC and the timely submission of reports by the IC;
9. Ensure that there is no retaliation at the end of Redington (and not tolerate any such retaliation) against any Company Personnel or an Aggrieved Person who files a complaint of Sexual Harassment in good faith or is a witness in the IC proceedings;
10. While discharging the duties / responsibilities enumerated here in this Policy, the HR Head shall act independently without any interference and shall report to, and is answerable only to the Full Time Director of Redington for such matters.
11. Informing employees of the relevant laws and create awareness via enterprise level mailer

## Sexual Harassment and clients/partners

1. Redington encourages its clients/partners to have a commitment to a Sexual Harassment free working atmosphere within their organizations. Redington may play a facilitating role in redressal of complaints of Sexual Harassment in such circumstances. Particularly, where Sexual Harassment of the Aggrieved Person occurs as a result of an act or omission by any third party, including Company's vendors or contract labour deployed by such vendors, customers or a visitor, then Redington shall take all necessary and reasonable steps to assist the Aggrieved Person to lodge a complaint with the appropriate forum against such third party and/or shall also take action against such third party as per this Policy and the Act and subject to the terms of contract, if any, with the employer of the third party.
2. Further, it is clarified that where Sexual Harassment occurs as a result of an act or omission by a Respondent, who is employed on the rolls of Redington, against a third party including Redington's vendor and/or its employees, customer or a visitor ("**External Party**") in the course of official duties, inside or outside the premises of Redington, even in such situations, Redington shall take such action against such employee as may be appropriate based on due investigation as per the process set out under this Policy and the Act and subject to the terms of contract, if any, with the employer of the External Party.

### Some practical situations for better understanding

1. **Question:** *While on an office trip, a male colleague of mine repeatedly asked me out for a drink and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We*

*weren't in the office, and it was "after hours" so I wasn't sure what I should do. Is it harassment?*

**Answer:** *Yes, it is Sexual Harassment. This type of conduct is not tolerated, not only during working hours but in all work-related situations including business trips. If you think giving a warning to the colleague might help, do that. However, there is no obligation to first warn the colleague, and you may report the problem immediately.*

2. **Question:** *I just learned that a good friend of mine has been accused of Sexual Harassment and that an investigation is being launched. I can't believe it's true and I think it's only fair that I give my friend an advance warning or a "heads up" so he can defend himself. Don't I have a responsibility as a friend to tell him?*

**Answer:** *Under no circumstances should you give him a "heads up." Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An allegation of Sexual Harassment is a very serious matter with implications not only for the individuals involved but also for Redington. Alerting your friend could jeopardize the investigation and expose Redington to additional risk and possible costs.*

## **Date of Effect**

The Policy shall be effective from November 2, 2022.

## **Policy Implementation and Review**

The Policy will be implemented and reviewed by the HR department. Redington reserves the right to amend, abrogate, modify, rescind / reinstate the entire Policy or any part of it at any time, subject to compliance with applicable law.