

Anti – Harassment Policy (POSH)

Last Updated Date: July 18th, 2023

PROPRIETARY & CONFIDENTIALITY NOTICE:

This document is the property of RoundGlass and contains HIGHLY CONFIDENTIAL information. This document, and the information contained therein, shall not be disclosed to others without written permission of RoundGlass and shall not be duplicated or used except in accordance with the limited conditions under which it was provided by RoundGlass.

POSH (PREVENTION OF SEXUAL HARASSMENT) POLICY

We at RoundGlass are committed to creating and maintaining a work environment which is free of any form of harassment and exploitation including sexual harassment.

Workplace harassment is a form of gender discrimination which violates a person's fundamental right to equality and right to life, guaranteed under Articles 14, 15 and 21 of the Constitution of India ("Constitution"). Workplace harassment not only creates an insecure and hostile working environment for all Associates but also impedes their ability to deliver in today's competing world. Apart from interfering with their performance at work, it also adversely affects their social and economic growth and puts them through physical and emotional suffering.

The Prevention of Sexual Harassment Policy forms the foundation of our commitment to the prevention and elimination of harassment (including sexual harassment) at workplace. This policy is applicable to all RoundGlass India associates. This policy has been formed to prevent, prohibit and or deter the commission of the acts of harassment at the workplace and to provide the procedure for redressal of complaints pertaining to sexual harassment.

This policy is in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("SHWW Act").

Sr. No.	Description of Key Updates in the Version	Date
1.	Policy Update Ver2.0	18 July, 2023

Table of Contents

1.	Policy Statement.....	5
2.	Objective.....	5
3.	Scope.....	5
4.	Overview.....	5
5.	Constitution of Internal Complaint Committee.....	6
6.	Complaint handling process	7
6.1.	Complaint of sexual harassment at the workplace.....	7
6.2.	Conciliation	8
6.3.	Inquiry into complaint	8
6.4.	Action when inquiry is pending	9
6.5.	Inquiry report	10
6.6.	Criminal/Legal Proceedings	10
6.7.	False allegation.....	10
6.8.	Appeal.....	10
7.	Definition	10
8.	Confidentiality and Safeguards	13
9.	Duties of The Employer.....	13
10.	Breach of Policy.....	14
11.	Timeline for Activities Under the Policy	15
12.	Questions.....	15
13.	Changes & Modifications	16

1. Policy Statement

The Company strictly prohibits any form of harassment against any associate, visitor, contract associate, interns, trainees or applicant for employment (whether in office premises or outside while on assignment) of RoundGlass.

2. Objective

RoundGlass is committed to creating a healthy working environment that enables associates to work without fear of harassment. RoundGlass aims to make its associates sensitive about what is considered to be harassment, how they can raise concerns and whom they should approach from a redressal perspective. In compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made thereunder ("SHWW Act"), this policy has been formed to prevent, prohibit and or deter the commission of the acts of sexual harassment at the workplace and to provide the procedure for redressal of complaints pertaining to sexual harassment.

3. Scope

- The Company strictly prohibits any form of harassment against any associate, visitor, contract associate, interns, trainees or applicant for employment (whether in office premises or outside while on assignment) of RoundGlass.
- It covers harassment (including sexual harassment) committed within the company premises as well as outside the company premises in which Associates/other stakeholders may find themselves in connection with their employment/ company services. This applies equally to relations between superior and subordinates as well as between peers. This is equally applicable to harassment either way between opposite genders, between members of the same gender or with those Associates that may not identify themselves with a given gender.

4. Overview

At RoundGlass we have zero tolerance for Harassment. We value every single Team Member working in the Company and wish to protect their dignity. In doing so, we are determined to promote a working environment in which persons of all gender work side by side as equals in an environment that encourages respect, harmony, productivity and individual growth. RoundGlass will act to prevent inappropriate, unwelcome and unsolicited behavior, or any other form of sexual harassment by

- Providing a safe workplace environment;
- Nurture and promote gender sensitive, gender neutral and safe working environment at all RoundGlass Offices and locations and ensure safety from persons coming into contact at such places and remove underlying factors that contribute towards a hostile work environment against all Associates alike;
- Publishing in the workplace the potential penal consequences of harassment and information about the internal complaints committee ("Committee" or "ICC") established further to the law in India;
- From time to time, organizing workshops and awareness programs periodically for associates with regard to the law, and orientation programs for members of the Committee;
- Providing necessary facilities for dealing with complaints and conducting inquiries;
- Promptly, confidentially and sensitively address issues related to Harassment and laying down the procedures for the resolution, settlement or prosecution of acts of Harassment;
- Providing assistance to the aggrieved associate;
- Initiating action as required under the law in India;
- Treating harassment as gross misconduct under internal disciplinary rules.

5. Constitution of Internal Complaint Committee

An Internal Complaints Committee has been appointed by RoundGlass to consider any complaints of harassment and deal with all cases of alleged harassment and otherwise, to implement this Policy. For any complaint, an Internal Complaints Committee consisting of at least 3 internal members, and one external member shall deal with complaints of harassment. The names of members of the Committee appointed from time to time shall be displayed for the information of the associates along with their designation, office of working, telephone number & email.

The Internal Committee shall consist of the following Members for a term not exceeding three (3) years:

- i) The Presiding Officer, shall be a woman Team Member employed at a senior level from amongst the Team Members' at RoundGlass Office (or, where a senior woman Team Member is not available at the relevant RoundGlass Office, the Presiding Officer shall be nominated from any other Office)
- ii) At least two (2) Members from amongst Team Members preferably committed to the cause of women or, who have experience in social work or who have legal knowledge;
- iii) One (1) 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;
- iv) At least half of the total Members (for this purpose Member will include the Presiding Officer) of the Internal Committee so appointed should be women; and/or
- v) In the event a Complaint is received from Aggrieved Persons (not being women), the Internal Committee may co-opt additional Members on a case-to-case basis

Members who form part of the Internal Complaints Committee are listed in Annexure -II with their contact details.

The Committee as far as possible shall hold the proceedings in the office or in any other premises at the place in which the complainant is posted. However, the Committee, at its discretion and without causing avoidable inconvenience to the complainant may hold the proceedings at the corporate office of the Company or any other place as decided by the Committee, or through a video or audio call.

The Committee will submit the annual report in each calendar year to RoundGlass and the District Officer in the manner required by law.

6. Complaint handling process

6.1. Complaint of sexual harassment at the workplace

STEP 1

Any aggrieved Associate or Visitor may make a complaint to the Internal Committee either for themselves or on behalf of another Associate/Visitor. This shall be made in a written format (by email or letter) to the chairperson of the Committee (Proforma of the Incident Reporting Format is annexed as Annexure III). The aggrieved person can also make a complaint on poshiccin@round.glass.

- If the complaint cannot be made in writing, the Chairperson or any Member of the Committee will provide all reasonable assistance so that the written complaint can be made.
- The complaint should, as far as possible, cover the following:
 - Victim Name
 - Respondent
 - Brief nature of Complaint, along with date and time and location of where the incident occurred
 - Any Witness
 - Any supporting document or material
- The complaint can be made:
 - Within a period of three months from the date of the incident, or
 - If there is a series of incidents, within a period of three months from the date of last incident.
 - In a fit case, the Committee may condone the delay in filing the complaint and allow the complaint even after three months.

STEP 2

The Committee will send one copy of complaint to the respondent within a period of seven working days.

STEP 3

The respondent will file a reply to the complaint along with supporting documents within ten working days from the date the respondent receives the copy of the complaint.

STEP 4

The Committee will undertake a detailed investigation and after giving written notice of fifteen days to the party concerned, can terminate an inquiry or give an ex parte decision if either the complainant or the respondent fails, without sufficient cause, to present themselves for three consecutive hearings convened by the Chairperson.

- No legal practitioner may represent a party before a Committee proceeding.
- If the aggrieved associate is unable to make a complaint because of physical or mental incapability, death, their legal heir or such other person as is permitted by the law, may make the complaint.
- The Committee may, for reasons recorded in writing, extend the time limit by a further period not exceeding three months, if it is satisfied that circumstances prevented the filing of a complaint within the first three months.

6.2. Conciliation

- The Committee may, before initiating an inquiry and at the request of the aggrieved associate take steps to settle the matter between aggrieved associate and the respondent through conciliation.
- No monetary settlement shall be made the basis of conciliation.
- If a conciliation is arrived at, the committee shall record the settlement and send it to RoundGlass P&C team for action to be taken as recommended, and no further inquiry shall be conducted by the Committees.
- The Committee shall provide copies of the recorded settlement to both the aggrieved associate and to the respondent.

At the request of the complainant, the Committee may recommend to RoundGlass to provide interim measures such as: (i) transfer of the aggrieved Associate or the respondent to any other workplace; (ii) granting leave to the aggrieved Associate up to a period of 3 months in addition to their regular statutory/ contractual leave entitlement; (iii). restrain the respondent from reporting on the work performance of the aggrieved Associate or doing their performance appraisal, and duties may be transferred to other Associate/Leader.

6.3. Inquiry into complaint

STEP 5

The member receiving the complaint will immediately record the time and date of receiving it and simultaneously inform the Chairperson.

STEP 6

The Committee shall, if the respondent is an associate, make inquiry into the complaint in accordance with the disciplinary and grievance procedure of RoundGlass.

- If the aggrieved associate informs the Committee that any term or condition of the settlement arrived at in Conciliation has not been complied with by the respondent, the Committee shall make an inquiry into the complaint.

STEP 7

If the aggrieved associate and the respondent are both associates, they shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both so that they make representation against the findings before the Committee.

ROLE OF INTERNAL COMPLAINT COMMITTEE (ICC)

- In conducting an inquiry, a minimum of 3 (three) Members of the Committee including the Chairperson shall be present.
- The Internal Complaint Committee can call the respondent or any associate or any person for questioning. Such people shall cooperate with the Internal Complaint Committee in every way. Non-cooperation, not providing the desired information or giving wrong information by anyone will be grounds for strict disciplinary action.
- For all locations where physical presence of the Committee is not feasible, issues would be discussed and consulted with them through Virtual presence (Video Conference), phone or any other means.
- The Committee has the power to:
 - a) Summon and enforce the attendance of any person for examination;
 - b) Require discovery and production of documents; and
 - c) Deal with any other matter as may be prescribed by the law.
- The committee will complete an inquiry within a period of 90 days.

6.4. Action when inquiry is pending

Committee may recommend to RoundGlass P&C Team the following:

- Transfer the aggrieved associate or the respondent to another department; or
- Grant leave to the aggrieved associate up to a period of three months (in addition to the leave an associate would be otherwise entitled to); or
- Grant such other relief to the aggrieved associate as may be prescribed by law.

RoundGlass P&C Team shall implement the recommendations made and send the report of such implementation to the Committee.

6.5. Inquiry report

STEP 8

The Internal Complaint Committee shall strive to complete the inquiry at the earliest but no later than the time frame provided by the law from the date of the receipt of written complaint and the inquiry report/ recommendation has to be issued within 10 days from the date of completion of inquiry.

STEP 9

The recommendation must be acted upon, within 60 days of its receipt.

6.6. Criminal/Legal Proceedings

If the nature of harassment is of a kind which is an offense under the Indian Penal Code or under any other law, the Committee Chairperson shall initiate appropriate action in accordance with law by making a complaint with appropriate authority. The People & Culture - Leader will be in charge of this process.

6.7. False allegation

Any complaint of harassment against another person which is proven or determined to be false or frivolous or malicious in nature or if misleading documents have been produced in support of the complaint shall be treated as an offence and liable for strict disciplinary action or summary termination as decided by the Internal Complaint Committee or my recommend to any action, such as written apology, warning, reprimand, censure, withholding of promotion or pay rise or increment, termination of service, counseling or community service.

6.8. Appeal

As per section 18 of the Act an appeal may be made as per the Service Rules applicable to the person making the appeal. Rules are to be prescribed by the appropriate authority for manner of making appeals where no service rules exist.

7. Definition

ACT

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

ASSOCIATE

A person employed at a workplace for any work on regular, temporary, adhoc 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 contractor worker, probationer, trainee, apprentice or called by any other such name.

“AGGRIEVED PERSONS”

Any Associate or Visitors (other than Aggrieved Women) who are affected as victims of Sexual Harassment by the Respondent.

AGGRIEVED WOMEN

A Women associate, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

RESPONDENT

A person against whom the aggrieved associate has made a complaint of sexual harassment.

HARASSMENT

“Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

-

- a) Physical contact and advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Sending sexually colored or offending emails or SMS.
- f) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- g) Using position of power in organizational hierarchy, seniority or gender to demand personal favors

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:

1. Implied or explicit promise of preferential treatment in an associate’s employment; or
2. Implied or explicit threat of detrimental treatment in an associate’s employment; or
3. Implied or explicit threat about an associate’s present or future employment status; or
4. Interference with an associate’s work or creating an intimidating or offensive or hostile work environment for an associate; or
5. Humiliating treatment likely to affect an associate’s health or safety.

Harassment should not be confused with simple friendly behavior or with more intimate exchanges if these are desired and accepted. The difference between the friendly behavior and harassment is that sexual harassment (including sexual harassment) is neither solicited nor accepted by the recipient, it is unwelcome or imposed.

MYTHS

- Only women can be sexually harassed.

False: the victim as well as the harasser may be of any gender. The victim does not have to be of the opposite sex. Sexual harassment must be by an associate of the company for the conduct to be harassment.

False: harassment could also occur as a result of an act of omission or commission by any third party or outsider.

- It is sexual harassment to ask a co-worker for a date, if that person has already indicated no interest.

True: since in such a case the behavior leads to unwelcome remarks/advances.

- Jokes or generic comments made in a lighter note are not offensive.

False: any comments perceived as off-color by an associate who feels they are undesired, come under the purview of harassment especially where comments or jokes target a particular gender, community, race, region, religion or any other affiliation.

NOTE:

The above is only illustrative and not exhaustive and sexual harassment includes such and similar behavior even if committed off workplace premises. Harassment can be based on the perception of a purported victim, regardless of whether there is any intent on the alleged perpetrator's part. Please refer to Annexure A for some examples of sexual harassment.

WORKPLACE

Workplace includes the following:

- Office premises, office events/parties and any place visited by the associate arising out of or during the course of employment, and
- Transportation provided by the employer for undertaking such journey.

ICC

Internal Complaint Committee constituted in accordance with the provisions of this policy and the SHWW Act.

MANAGEMENT

Management means Company's Managing Director/ Director/ Manager or such other officer or Officers/nominee or nominees as may be authorized in this behalf by the Managing Director/Director and notified in the Notice Board of the establishment and also includes disciplinary authority and Appellate Authority as notified under the service rules or the certified standing orders as applicable.

EMPLOYER

Employer means in relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate government or local authority, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate government or local authority as the case may be, may by an order specify in this behalf.

In any workplace not covered under sub clause (i) of Section 2 (g) of the Act, any person responsible for the management, supervision and control of the workplace.

In relation to workplace covered under Section 2 (g) (i) and (ii) the person discharging contractual obligations with respect to his or her associates.

8. Confidentiality and Safeguards

CONFIDENTIALITY

All harassment complaints will be treated with utmost confidentiality to the extent possible not limiting to the information regarding justice provided to a victim of harassment may be disseminated without disclosing the name, address, identity or any other particulars that would allow identification of the aggrieved woman and witnesses. All Associates and external member involved in the Inquiry/who have access to the information in the course of the investigation, are liable to keep the information to self and not discuss or share it further, unless necessary to complete the inquiry.

SAFEGUARDS

- All efforts will be made by the Company to ensure safety of the complainant against any form of discrimination, intimidation and abuse.
- Reprisal by any associate against any other associate or intimidating or influencing a witness in sexual harassment complaint will not be tolerated and will be punished by strict disciplinary action.

9. Duties of The Employer

- Employer shall provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- Display at any conspicuous place in the workplace the penal consequences of sexual harassments; and the order constituting the Internal Committee under sub-section (1) of section 4 of the Act.
- Organize workshops and awareness programs at regular intervals for sensitizing the associates with the provisions of the Act and orientation programs for the members of the Internal Committee in the manner as may be prescribed.
- Provide necessary facilities to the Internal Committee or Local Committee as the case may be, for dealing with the complainant and conducting an inquiry.
- Assist in securing the attendance of the respondent and witnesses before the Internal Committee or Local Committee as the case may be.
- Make available such information to the Internal Committee or Local Committee as the case may be, as it may require having regard to the complaint made under sub-section (1) of section 9.
- Shall provide assistance if an associate chooses to file a complaint in relation to the offence under the Indian Penal code or any other law for the time being in force.
- Cause to initiate action under the Indian Penal Code or any other law for the time being in force, against a perpetrator, or if the aggrieved woman so desires where the perpetrator is not an associate in the workplace at which the incident of sexual harassment took place.

- Treat such sexual harassment as a misconduct under the service rules and initiate action for such member.
- Monitor the timely submission of reports by the Internal Committee.

10. Breach of Policy

Failure to observe the requirement of this policy may result in disciplinary action potentially resulting in dismissal. Harassment may be a civil or criminal under law leading to civil duties, other penalties, and/or criminal proceedings leading to imprisonment.

To the extent the law specifically requires steps and processes to be followed in an alleged case of sexual harassment that are different from those as set out in the disciplinary and grievance procedure of RoundGlass, the requirements of the law will prevail, and all references in this document to the disciplinary and grievance procedure of RoundGlass shall be read accordingly.

11. Timeline for Activities Under the Policy

NO.	ACTION POINT	AUTHORITY/CONCERNED PERSON	TIME LIMIT
1	Complaint	Complaint to be lodged by aggrieved associate before Internal Complaints Committee (ICC)	a) Within a period of 3 months from the date of the incident, or b) In case of series of incidents, within a period of 3 months from the date of last incident
2	Initiation of inquiry proceedings	By the ICC, by sending the copy of the complaint to the respondent	Within a period of 7 working days from the date of receipt of complaint.
3	Reply by the respondent along with his list of documents, names and addresses of witnesses	To the ICC	Within 10 working days from the date of receipt of copy of complaint forwarded by ICC.
4	Completion of inquiry proceedings	By ICC	Within 3 months from the date of receipt of complaint
5	Submission of Inquiry report and findings along with recommendations by ICC	To the Management	Within 10 days of completion of Inquiry proceedings by ICC
6	Implementations of recommendations made in the Inquiry report of ICC	By the Management	Within 60 days from the date of receipt of recommendations made in the inquiry report by the ICC
7	Appeal under clause 5 of the Policy	By the aggrieved person	Within a period of 90 days from the date of receipt of recommendations by ICC

12. Questions

Contact any of the members of the Complaints Committee or you may contact People & Culture Leader at RoundGlass India.

13. Changes & Modifications

All requirements of the SHWW Act shall be applicable to this Policy. Any additional requirement of the above-mentioned Act as amended will also be applicable to this Policy. This policy can be altered or modified at the discretion of the Management only.

At RoundGlass, we reserve the right to change/update, policies, procedures, and benefits at any time.

Note: Change in any policy or process is effective when published in writing or electronically. An associate is responsible to stay informed and updated about these changes.

Policy Owner: Leader – People & Culture

Annexure – I

VISUAL	VERBAL	WRITTEN	TOUCHING	POWER	FORCE
Ogling	Requests for dates, sexual demands/favors or unwanted sexual advances	Love letters sent at complainant’s home/messages via phone or mobile/email	Violating Space	Using position to request dates, sex etc.	Criminal offences
Staring	Questions about personal life	Obscene poems/jokes/stories	Patting/trying to tap	Promising	
Posters	Lewd/ Lustful comments	Obscene letters, messages via phone or mobile/email etc.	Grabbing	Threatening loss of job	
Magazines	Sexually explicit jokes or remarks or demeaning terms or sexually colored remarks	Cards	Pinching	Force to shake hand with no specific reason	
Flyers	Whistling		Caressing		
Calendars			Kissing/attempt to kiss		

Annexure – II

INTERNAL COMPLAINT COMMITTEE (ICC) FOR INVESTIGATION OF ALL COMPLAINTS RELATING TO SEXUAL HARASSMENT AT WORKPLACE.

ICC MEMBERS (CENTRAL COMMITTEE)

#	NAME	DESIGNATION	CITY
1	Simran Dhaliwal	Chairperson	Mohali
2	Dr. Sagarika Bhatia	Member	Mohali
3	Natalia Vega	Member	Mohali
4	Shailendra Singh	Member	Mohali
5	Nitin Pant	Member	Mohali
6	Soha Moitra	Member	-

Depending on which entity the case is from, we will have an additional member of the respective entity from the list below.

#	NAME	DESIGNATION	CITY
1.	Rohit Krishna	Member	Mohali
2.	Megha Moorthy	Member	NCR
3.	Gayatri P	Member	Mohali
4.	Navleen Lakhi	Member	Mohali
5.	Gurjeet Kaur	Member	Mohali

LOCATION SPOC

Local associate who will assist in data gathering and primary information collection. May or may not be part of the entire investigation/proceeding.

NAME	LOCATION
Navleen Lakhi	Mohali
Disha Pandey	NCR

ANNEXURE – III

INCIDENT REPORTING FORMAT

(The Format below are indicative guidelines for filing Complaints and not mandatory. A Complainant may make a Complaint in any other Form)

INCIDENT REPORTING FORMAT	
Name of the Complainant/ Victim:	
Incident Reported against (Name of the Respondent):	
Date of Reporting	
Anything else that you would want to mention?	

INCIDENT DETAILS	
What happened?	
Who was involved?	
When did the incident take place?	

Where did the incident take place?	
How did you get to know this? (applicable where third party is reporting the incident)	
Was it the first time this has occurred, or has it happened previously?	
Any witnesses? If yes, please share their names?	
Is there any other physical evidence or documents of the incident?	
If yes, please attach the document or evidence	
Anything else that you would want to mention?	

(Signature of the Complainant/ Victim)