

**POLICY ON SEXUAL HARASSMENT AT WORKPLACE
OF REGAAL RESOURCES LIMITED DULY APPROVED IN
THE BOARD MEETING DATED 23-05-2023**

POLICY ON SEXUAL HARASSMENT AT WORKPLACE

{As per requirement of the provisions of *THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (Prevention, Prohibition and Redressal) Act, 2013*}

- I. Considering the need of the Society and in accordance with the requirement of the provisions of *"The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013"*, [*"the POSH Act"*], the Company has decided to adopt a policy with regard to the matter related to sexual harassment at workplace and to constitute an *Internal Complaint Committee ["ICC"]* to oversee the matters related thereto.
- II. **REGAAL RESOURCES LIMITED ["RRL"] hereby constitute an Internal Complaints Committee (ICC) by the Order of Board of Directors, dated 23rd May, 2023.**
- III. Members of the committee:
 1. One presiding officer – a senior level women employee.
 2. Two members (at least) – senior level employees.
 3. One External member – from any Non-Government Organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. The member from the NGO shall be paid the prescribed fees or allowances for holding the proceedings of the Internal Committee.

At least one-half (1/2) of the total members shall be women and every member shall hold office for a period not exceeding three years.

- IV. The objectives of the Internal Complaints Committee are:
 - Prevent discrimination and Harassment against all employees, by promoting gender amity among employees;
 - Make recommendations to the Management for changes/elaborations in Employee Policy, to make them gender just and to lay down procedures for the prohibition, resolution, settlement and prosecution of acts of discrimination and sexual harassment against women by the employees;
 - Deal with cases of discrimination and Sexual Harassment against women, in a time bound manner, aiming at ensuring support services to the victimized and termination of the harassment;
 - Recommend appropriate punitive action against the guilty party to the Director/Management;
 - Follow any other procedure as mandated in the Act.
- V. Any Employee, aggrieved of any instance of sexual harassment shall refer the matter to the Committee immediately and the Committee after scrutinizing the

same will submit their findings to the HR team. The HR team in turn will take final decision. The Committee shall meet as and when the matter is referred to them. Any employee found to be guilty or involved in such conduct, shall be liable to strict disciplinary action from the company including termination of job.

VI. With regards to aforesaid policy 'sexual harassment' includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography; or
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Moreover, the following circumstances, if it occurs may amount to sexual harassment:

- implied or explicit promise of preferential treatment in her employment
- implied or explicit threat of detrimental treatment in her employment
- implied or explicit threat about her present or future employment status
- interferes with her work or creating an intimidating or offensive or hostile work environment for her; and
- humiliating treatment likely to affect her health or safety.

VII. Employees are responsible for fostering a Harassment free work environment. · All Employees shall be informed of this policy during recruitment and by general publicity during the course of their employment with the Company and shall be deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

VIII. Early Resolution Mechanism should be used to resolve problems of Harassment at the outset. · The complaint process, including the investigation, if necessary, should be completed without undue delay.

IX. Where the aggrieved employee is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

X. Corrective action must be taken timely in all situations of Harassment and the same must be communicated to all the parties involved in it.

XI. Mode of Registering complaint: -
Email at cs@regaal.in or
Contact any of the member of the ICC.

Note: If an aggrieved employee has any doubt regarding the appropriate authority, she may reach out to any of the member of ICC, or at cs@regaal.in.