

RISHITA DEVELOPERS PRIVATE LIMITED

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Posh Policy (As approved by the Board of Directors)

1. INTRODUCTION

Rishita Developers Private Limited ("Company") is committed to providing a safe, secure, and dignified work environment for all employees. This Policy is framed as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and Rules, 2013.

Protection from sexual harassment and the right to work with dignity are fundamental human rights recognized globally.

2. OBJECTIVE

The objectives of this Policy are to:

- To provide protection against sexual harassment at the workplace.
- To ensure a safe working environment irrespective of gender.
- To define processes for prevention, reporting, inquiry, and redressal of complaints.
- To create awareness and ensure zero tolerance for sexual harassment.

3. DEFINITIONS

The following key terms are defined for clarity:

Company	Rishita Developers Private Limited.
"Act"	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (read with amendments, if any);
"Rule/s"	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules 2013

<p>"Sexual harassment"</p>	<p>Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals within the course of his/ her work who is not employed by the Company.</p> <p>"Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:</p> <ul style="list-style-type: none"> • Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely: <ol style="list-style-type: none"> 1. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit. 2. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation. 3. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will. 4. Demand or request for sexual favors. 5. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body. 6. Display of pictures, signs with sexual nature/ connotation/ overtones in the work area and work-related areas. 7. Showing pornography, making or posting vulgar/ indecent/ sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc. 8. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's 9. Giving gifts or leaving objects that are sexually 10. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and 11. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature. • The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment: <ol style="list-style-type: none"> 1. Implied or explicit promise of preferential treatment in employment; 2. The implied or explicit threat of detrimental treatment in employment; 3. The implied or explicit threat about the present or future employment status; 4. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or 5. Humiliating treatment is likely to affect health or safety. <p>An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.</p>
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"Aggrieved woman"	Aggrieved woman means In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
"Respondent"	Respondent means a person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy
"Employee"	Employee means a person employed at the workplace, for any work 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 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.
"Workplace"	Workplace means Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company. Places visited by the Employee arising out of or during employment including official events, accommodation, and transportation provided by the employer for undertaking a journey.
"Employer"	Employer means A person responsible for management, supervision, and control of the workplace

5. APPLICABILITY & SCOPE

This Policy is applicable to:

- All employees: permanent, temporary, ad-hoc, probationers, trainees, interns, apprentices, consultants, and contract workers.
- Any woman employee, irrespective of age or employment status.
- All workplaces: offices, project sites, vehicles provided by the Company, client locations, offsite meetings, work travel, training programs, work-from-home virtual platforms.
- All incidents occurring during employment, travel, training, company events, or any situation arising out of work-related interactions.

Where sexual harassment occurs to any employee of the Company as a result of an act by a third party or outsider during official duty, the Company shall take all necessary and reasonable steps to assist the affected person with support, guidance, and preventive action, including helping the individual file a complaint with relevant authorities.

6 PROCEDURES & GUIDELINES

6.1 Constitution of the Internal Committee (IC)

As per Section 4 of the Act, the Company shall constitute an Internal Committee.

Composition:

- Presiding Officer: A senior woman employee.
- Two Employee Members: Experience in social work/legal knowledge.
- One External Member: From NGO or person familiar with women’s rights/law.

Tenure: 3 years.

Quorum for inquiry meetings: Minimum 2 members, including Presiding Officer.

IC Members :

The Internal Committee (IC) for addressing complaints under the Prevention of Sexual Harassment (POSH) Policy is constituted as per the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The current composition of the IC is as follows:

S.No.	Name	Designation	Role in IC
1.	Ms. Lavee Agrawal	Director	Presiding Officer
2.	Ms. Sheetal Bhagwani	Assistant General Manager	Member
3.	Ms. Afsar Jahan	Compliance Executive	Member
4.	Mr. Suresh Kumar Mishra	External Expert	External Member

6.2 Filing a Complaint

- Complaint must be filed within 3 months of the incident (extendable by 3 months).
- Complaint can be submitted:
 - In writing or email
 - To the Presiding Officer / IC
- In case of physical/mental incapacity, complaint may be filed by:
 - Relative, friend, co-worker, or other person

Complaint should include details of incident(s), date, place, and witnesses.

6.3 Redressal Process

6.3.1 Conciliation

- Conducted only at the *request of the complainant*.
- No monetary settlement allowed.
- If settlement occurs, inquiry is closed.

6.3.2 Inquiry

- IC sends complaint copy to respondent within 7 days.
- Respondent submits written reply within 10 days.
- IC must complete inquiry within 90 days.
- Inquiry must follow natural justice principles.
- Lawyers are not allowed to represent either party.
- Inquiry may be terminated if a party fails to appear for 3 consecutive hearings.

6.3.3 Interim Relief (During Inquiry)

IC may recommend:

- Transfer of complainant or respondent.
- Up to 3 months leave for complainant (not deducted from regular leave).
- Any other appropriate relief.

6.3.4 Confidentiality

- Identity of complainant, respondent, witnesses, and details of inquiry shall not be disclosed.
- Violation may lead to strict disciplinary action.

6.3.5 Sexual Harassment by Third Parties

Company will assist complainant in filing case with appropriate authority if harassment is by someone not employed by the Company.

6.3.6 Protection to Complainant

Company prohibits retaliation or victimization against complainant or witnesses.

6.3.7 Appeal

Either party may appeal within 90 days of IC recommendation.

6.3.8 Disciplinary Action (If Complaint is Proved)

IC may recommend:

- Warning or written apology
- Withholding increment/promotion
- Transfer
- Suspension or termination
- Deduction from salary for compensation

6.4 False or Malicious Complaints

- If a complaint is found to be malicious or intentionally false, action may be taken.
- Inability to prove allegations does not amount to malicious intent.
- Malicious intent must be established through an inquiry.

7. IMPLEMENTATION & COMMUNICATION

The Company shall:

- Conduct induction and periodic awareness sessions.
- Display POSH posters at all workplaces.
- Maintain IC contact details publicly within premises.
- Ensure all employees understand provisions of the Policy.

8. MONITORING & EVALUATION

- IC must prepare an Annual Report containing:
 - Number of complaints received
 - Number disposed of
 - Number pending
 - Workshops and awareness conducted

Annual Report must be submitted to Employer and District Officer.

Confidentiality

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed

**For and on behalf of
Rishita Developers Private Limited**

SD/-

**Mr. Sudhir Kumar Agarwal(Director)
DIN: 01783755**

SD/-

**Ms. Lavee Agrawal(Director)
DIN: 01836581**