

## Sexual and Other Unlawful Harassment

Rashi Peripherals Limited believes that each individual we employ has the right to be free from inappropriate, unwelcome workplace conduct where that conduct could be viewed as workplace harassment. Inappropriate conduct based on an individual race, color, creed, religion, sex, gender, national origin, ancestry, ethnicity, age, handicap or disability, marital status, civil union status, domestic partnership status, citizenship status, genetic information, sexual orientation, or any other protected group status (collectively referred to as “Protected Status”), which has the purpose or effect of unreasonably interfering with an individual’s work performance, or which otherwise creates an intimidating, hostile or offensive working environment, may constitute prohibited workplace harassment. Therefore, Rashi Peripherals Limited does not permit any inappropriate comments or communications to be made, distributed, transmitted or posted in any Rashi Peripherals Limited work location, including but not limited to, Rashi Peripherals Limited offices, client offices and off-site locations, or at any business-sponsored or business-related function. Comments or communications include, but are not limited to, statements, questions, jokes, photographs, videos, drawings, cartoons, gestures, or stories, whether written, oral, physical, digital or electronic (including e-mail, text messages, and voice mail). A comment or communication is inappropriate if it is unwelcome and contains language which is threatening, harassing, offensive, obscene, sexually explicit, profane, or derogatory towards Protected Status.

**Sexual Harassment** - The most widely recognized area of workplace harassment is sexual harassment. Unwelcome, unsolicited conduct of a sexual nature, including making requests or sexual favors, conditioning the grant or denial of a work benefit on submission to sexual activity, or making sexual activity an expressed or implied term or condition of employment, constitutes sexual harassment and will not be tolerated. Sexual harassment is particularly egregious when a supervisor is the initiator or cause of such conduct. Sexual harassment can result from the conduct of a male to a female, a female to a male, or between persons of the same gender. By way of example, the following conduct can be sexual harassment:

- Threatening or insinuating that an employee’s submission to or rejection of sexual advances will in any way influence any personnel decision regarding that employee’s employment, evaluation, ways, advancement or assigned duties
- Joking, teasing, or touching
- Advances or propositions
- Continual or repeated verbal abuse of a sexual nature
- Graphic word used to describe an individual
- Lewd, risqué or obscene language, actions or gestures
- Gender, race or nationality targeted jokes or cartoons
- The display in the work place of sexually suggestive objects or pictures
- Intentional, wrongful touching.

**Disciplinary Action** - Workplace harassment is a violation of state and federal laws against employment discrimination and of Rashi Peripherals Limited’s internal policies. Rashi Peripherals Limited will not tolerate harassing conduct whether the offender is a Manager, a co-worker, a client, a vendor, or a visitor, and will be dealt with accordingly. Any employee found to have committed acts that constitute workplace harassment will be subject to severe disciplinary action, up to and including discharge. This includes any act by an employee against a Manager, a co-worker, a client, a vendor, or

a visitor. Any non-employee found to have committed acts against an employee that constitute workplace harassment will be subject to consequences appropriate to that individual.

**Reporting Complaints / REDRESSAL** - Any employee who believes that he/she is or has been harassed by a Manager, a co-worker, a client, a vendor, a visitor, or anyone else associated with Rashi Peripherals Limited

The victim of sexual harassment can approach the Committee for redressal. If the issue is not addressed in 14 days the HR / Managing Director can be contacted. The complaint will be protected from retaliation and appropriate disciplinary action will be taken against the offender, if there are reasonable grounds to believe the complaint.

At the time of complaint, the complainant will be asked to provide specific information about the alleged harassment, including any documents, photographs, audio or video recording, or other physical, digital, or electronic evidence, and to sign a written statement. While a signed, written statement is preferred, allegations supported only by an oral or e-mailed or texted or voice mail complaint also may be investigated.

**Non-Retaliation** - Employees raising allegations of workplace harassment or participating in an investigation of a harassment complaint will not be subject to disciplinary action or retaliation as a consequence of raising a complaint or participating in the investigation. Any supervisor or employee who takes any retaliatory action against any employee who raised a complaint or participated/is participating in a harassment complaint investigation, will be subject to severe disciplinary action. Nevertheless, Rashi Peripherals Limited may discipline any employee who knowingly makes a false allegation of workplace harassment against any other person.

**Investigating Complaints** - Rashi Peripherals Limited will conduct an investigation utilizing any notes, recordings, photographs, physical, digital or electronic evidence or other documentation and information regarding the harassment that the complaining employee provides. The investigation will look to uncover additional information as well, through review of documents and materials, and witness interviews.

All employees have a responsibility to Cooperate fully with the investigation of harassment. Although the extent of each investigation will vary, discretion and Cooperation are crucial at all levels.

As part of the investigation, the investigator generally will confront the alleged harasser with the allegations or with the facts underlying the allegations, and give this individual an opportunity to respond. The complaining employee need not be required to confront the alleged harasser face to face during the investigation.

The complaining employee will be instructed to bring to the attention of Rashi Peripherals Limited any future recurrences of harassment by the alleged harasser or by any other employee of, or other person involved with, Rashi Peripherals Limited. In addition, Rashi Peripherals Limited will make efforts to monitor behaviour and will follow up with the complaining employee to verify that inappropriate behaviour has not continued.

Disciplinary Procedures - The results of the investigation will be presented to the CEO, and/or other members of the Board (if the investigation involves the CEO) if he/she determines that there is reasonable cause to believe that harassment has occurred, Rashi Peripherals Limited will impose appropriate discipline, which may include termination. The CEO may consider the following factors in selecting disciplinary measures: the specific behaviours constituting the harassment, the severity and pervasiveness of the behaviours constituting the harassment, the effect of the harassing behaviour on the victim, the effect of the harassing behaviour on Rashi Peripherals Limited 's business operations, the effect of the harassing behaviour on other persons associated with Rashi Peripherals Limited , the supervisory relationship between the harasser and the victim, the previous behaviour of the harasser, and any other information the CEO deems to be relevant.

**Confidentiality** – Rashi Peripherals Limited will make efforts to keep the complaining employee's identity confidential from the alleged harasser. Because the primary objective of the investigation is to discover and eliminate harassment, however, the complaining employee may be identified on an "as needed" basis.

Generally, the allegations and the investigation will be kept confidential with the information shared on a need-to-know basis only, in order to protect all persons involved, and to protect Rashi Peripherals Limited. Employees involved in an investigation of workplace harassment, either as the accuser, the accused, the investigator, or as a witness, must keep all information about the investigation strictly confidential, both within and outside of Rashi Peripherals Limited, other than Cooperating with the investigation. Nevertheless, both the complaining employee and the accused will be advised as to the outcome of the investigation, although not all details of the investigation.

**To report your complaint, kindly send us email at : [womanhelp@rpetchindia.com](mailto:womanhelp@rpetchindia.com)**