



Prevention of Sexual Harassment Policy

(Approved by the Board on July 17, 2024 and made effective from July 17, 2024)

Contents

Contents.....	2
Policy on Prevention, Prohibition and Punishment of Sexual Harassment of Employees ...	3
1. OBJECTIVE.....	3
2. PURPOSE.....	3
3. SCOPE.....	4
4. DEFINITION:.....	4
5. COMPLAINT REDRESSAL COMMITTEE.....	5
6. COMPLAINT PROCEDURE.....	6
7. COMPLAINT REDRESSAL PROCEDURE.....	6
8. OTHER RELEVANT POINTS.....	8
9. RETALIATION PROHIBITED:.....	8
Complaint Redressal Procedure.....	6
Other Relevant Points.....	7
Retaliation Prohibited.....	8
Appendix I.....	9
Appendix II.....	10

Policy on Prevention, Prohibition and Punishment of Sexual Harassment of Employees

1. OBJECTIVE:

The objective of this policy is to provide protection against sexual harassment of employees at workplace. It also provides a mechanism for prevention and redressal of complaints of sexual harassment and for matters connected or incidental thereto. This policy is set up to help the organization maintain a healthy working environment that is safe and free of sexual harassment and protect the right of employees to work with dignity.

2. PURPOSE:

- 2.1. The purpose of this policy is to communicate that the company has a “zero tolerance” approach towards sexual harassment. Thus this policy defines the company’s position regarding employees indulging in harassing behavior and those being sexually harassed, in order to maintain a working environment that is free of sexual harassment.
- 2.2. Raymond Lifestyle Lifestyle’s stand is that sexual harassment is a form of misconduct that undermines the integrity of employment relationships, and the culture and image of the organisation. All employees have the right to work in an environment free from all forms of discrimination and conduct which can be considered harassing, coercive, or disruptive, including sexual harassment. The policy actively advocates the right of every Raymond Lifestyle employee to work in an environment free of all forms of sexual harassment – verbal, written, physical, visual or otherwise.
- 2.3. It is Raymond Lifestyle Lifestyle’s policy that harassment of employees on the basis of race, religion, colour, national origin, ancestry, handicap, medical condition, physical features, disability, marital status, age, sexual orientation and sex, including sexual harassment is unacceptable and will not be tolerated.
- 2.4. The policy believes that it impacts the morale and spirit of its employees if they are discriminated on any of the above basis points covered in 2.3.

3. SCOPE:

- 3.1. The policy covers all employees in all the SBUs in the Raymond Lifestyle Group as specified in Clause 4.1.
- 3.2. For those members of organizations that Raymond Lifestyle and its employees work with, including agents, trade partners, vendors, consultancies and any other firm that forms a part of the Raymond Lifestyle eco system, please refer guidelines in **Appendix I**.

4. DEFINITION:

- 4.1. "Employee" means any person on the rolls of the Company as well as persons associated with the company such as persons on deputation, contract, on probation, as apprentice, temporary, part time or working as consultants or called by any other name.
- 4.2. "Raymond Lifestyle" shall mean and include all divisions of Raymond Lifestyle Limited and its subsidiaries and such other companies that are and or may form party of the Raymond Lifestyle in the capacities mentioned above by whatsoever name called.
- 4.3. "Sexual harassment" includes any unwelcome act or behavior whether directly or by implication namely : physical contact, force and advances or a demand or , requests for sexual favors, physical confinement against one's will, or making sexually colored remarks or viewing or showing pornography or other offensive or derogatory pictures, cartoons, pamphlets or any other unwelcome physical, verbal or non-verbal conduct of sexual nature, and other sexually oriented conduct which is offensive or objectionable to the recipient, and technology-based communication including social media, emails and texting any other act likely to violate one's privacy. Further, 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:
 - a) Implied or explicit promise of preferential treatment in employment.
 - b) Implied or explicit threat of detrimental treatment in employment.
 - c) Implied or explicit threat about present or future employment status or interferes with work or creating an intimidating or offensive or hostile work environment.
 - d) Humiliating treatment likely to affect health or safety.

5. COMPLAINT REDRESSAL COMMITTEE:

Sexual harassment complaints at Raymond Lifestyle shall be addressed to and investigated by the members of the “Internal Complaints Committee”. The three Members of the Committee are permanent, and it constitutes two women employees at any given point in time.

The three permanent members of the Committee include:

- The Presiding Officer (PO) who shall be a woman employed at a senior level from amongst the employees on the rolls of Raymond Lifestyle (If senior woman officer is not available the PO can be nominated from other offices).
- Two members from the employees committed to the cause or have legal knowledge.
- One member from non-governmental organizations (NGO) or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Each member shall hold office for a period not exceeding three years from the date of their nomination.

For locations other than Head Office (HO) in Thane/ Mumbai there would be separate committees constituted for all factory locations/ regional offices which have representation of female employees. This committee will need to comply with the above guideline for “Internal Complaints Committee” at a local level. Except the nomination of member from the NGO would be from Central committee and he/she will be common member across all committees.

6. COMPLAINT PROCEDURE:

6.1. Any employee (Complainant) who feels and is being sexually harassed directly or indirectly may report the complaint within a period of 3 months from the date of incident and in the case of a series of incidents within 3 months from the date of last incident, to the Internal Complaints Committee on email icc@raymond.lifestyle.in or speak to any of the Committee members.

6.2. Provided, the Internal Complaints Committee may for reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.

- 6.3. The complainant must ensure that the complaint contains all the material and relevant details concerning the alleged sexual harassment including the names of the contravener (Respondent) in the format provided in **Appendix II**, while it is being taken up by the Internal Complaints Committee for investigation.

7. COMPLAINT REDRESSAL PROCEDURE:

- 7.1. After the complaint is received as above, the Internal Complaints Committee (Committee) will investigate the case as per rules laid down for the purpose.
- 7.2. The Committee may before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- 7.3. The Respondent may be called for a deposition before the Committee and the committee may also call for discovery and production of documents and an opportunity will be given to him/her to give an explanation, where after, the final report shall be made.
- 7.4. The inquiry as mentioned at 7.1 above shall be concluded within a period of 90 ninety days from the date on which the complaint was received by the Committee.
- 7.5. The Committee shall investigate all the facts and the final report and recommendations would be presented for action to the President HR, within a period of 10 days from the date of completion of the inquiry.
- 7.6. In case the Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the President HR that action for sexual harassment as misconduct in accordance with the service rules as may be prescribed, be taken against the Respondent which may range from a warning to transfer including dismissal as per the Disciplinary procedure of the Company.
- 7.7. In case the Committee arrives at the conclusion that the allegation has not been proved, it shall recommend that no action is required to be taken in the matter. The same will be communicated to both the parties.
- 7.8. In case the complaint is found to be false and the motive is established to be malicious, the Complainant shall be liable for appropriate disciplinary action as

advised by the Committee. However, such malicious intent on part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

- 7.9. The President HR will direct appropriate action in accordance with the recommendation proposed by the Committee. The President HR's decision in the matter will be final and binding.

When the investigation is completed, the Complainant and the Respondent will be informed of the outcome of that investigation. In the event of the Respondent/ Complainant seeking or requiring counselling intervention thereafter, the Management shall provide for the same.

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- 7.10. If the Complainant is not satisfied with the outcome of the proceedings before the Committee, the Complainant may prefer an appeal to the Court or tribunal prescribed under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules in case of women employees and aggrieved male employees can escalate his complaint to the President HR.

8. OTHER RELEVANT POINTS

- 8.1. The contents of the complaint, identity and address, inquiry, and any other information pertaining to the inquiry and conciliation proceedings recommendations and / or the action, if any, taken against the Complainant, Respondent and witnesses shall not be published, communicated or made known to the public, press and media and other employees by the Complainant, Committee, witnesses and other people involved in resolving the matter.
- 8.2. Every employee of Raymond Lifestyle is covered under this policy from the date of joining to retirement / termination / resignation including the notice period.
- 8.3. The management shall provide all necessary assistance for the purpose of effective implementation of the various aspects of this policy, in the best interest of every Raymond Lifestyle employee.
- 8.4. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

- 8.5. The Committee shall analyse and put up a report on all complaints of this nature on a biannual basis for submission to President HR.
- 8.6. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.
- 8.7. A safety audit would be conducted on a biannual basis for employees to proactively spot trends and eliminate them at an early stage.

9. RETALIATION PROHIBITED:

The Company will permit no employment-based retaliation against anyone who brings a complaint of sexual harassment or who speaks as a witness in the investigation of a complaint of sexual harassment. This policy shall be governed by The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules as and when it comes into force and such other amendments thereto. If the provisions or any provision of this policy is found to be incomplete, ambiguous, invalid, illegal or otherwise unenforceable, not inclusive and or not in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, the same shall not affect the other provisions hereof or the whole of this policy, but such provision shall be deemed modified to the extent necessary to render such provision enforceable.

10. The policy will be circulated to all Management Staff and will be available on RayConnect in the Policy Section.

APPENDIX I

For those Raymond Lifestyle employees that report sexual harassment by people outside of the rolls of Raymond Lifestyle, but serve as vendors, partners, agencies, consultancies or any other entity, this Appendix I of the Policy shall come into force and it states as follows:

1. The definition of sexual harassment as outlined in the main Policy draft in Clause 4.3 stands.
2. The Raymond Lifestyle employee complaining of sexual harassment shall complain to the Committee as outlined in Clause 6.1.
3. The Committee shall thereafter constitute a two-member sub group comprising the below to probe the complaint in detail:
 - a. The Business Head who manages the third party / vendor / consultancy / agency.
 - b. The Business HR of the Function that manages the third party / vendor / consultancy / agency.
 - c. The Redressal procedure shall be as detailed in Clause 7, with the addition that the decision will be jointly taken by the President HR, Committee and its sub-group for the case being investigated.
4. The Raymond Lifestyle management decision shall be final on the complaint.
5. All clauses in the policy document shall be valid in the investigation of the third party / agency / consultancy / partner, as the Raymond Lifestyle employee continues to be protected by the policy at all times. Communication of this policy, with all its appendices is compulsory to all third parties, consultancies / agencies and partners of Raymond Lifestyle.



APPENDIX II

Name of Complainant:

Employee Id:

Department:

Business Unit:

Date of Complaint:

Name of Respondent:

Department (if applicable):

Business Unit (if applicable):

Description of Complaint:

Any evidence/ material provided at the time of complaint:

Signature/ email id of Complainant:
