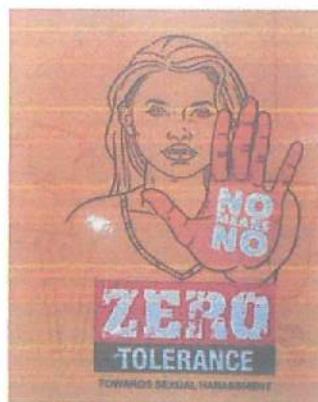




राष्ट्रीय केमिकल्स एण्ड फर्टिलाइज़र्स लिमिटेड
Rashtriya Chemicals and Fertilizers Limited

**The Prevention of
Sexual Harassment (POSH) Policy
in accordance with the
Provisions of the Sexual Harassment of Women
at Workplace
(Prevention, Prohibition and Redressal) Act,
2013 and the Rules**



गुरु
Presiding Officer - IC
CONTROLLED COPY



राष्ट्रीय केमिकल्स एण्ड फर्टिलाइजर्स लिमिटेड (भारत सरकार का उपक्रम)

Foreword From the Chairman's Desk

At **Rashtriya Chemicals and Fertilizers Limited**, we remain committed to upholding the highest standards of integrity, accountability, and fairness in all aspects of our functioning. We are committed to ensure that our workplace reflects the values enshrined in the Constitution of India—equality, dignity, and respect for all.

The **Prevention of Sexual Harassment (POSH) Policy** has been formulated in accordance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the Rules framed thereunder. The objective of this policy is to provide a safe, secure, respectful and a positive work environment that is free from any form of harassment, bullying or discrimination.

This policy lays down a structured framework for prevention, prohibition, and redressal of complaints of sexual harassment, thereby ensuring transparency and fairness in addressing such matters. It reinforces the organization's commitment to providing equal opportunity and maintaining a workplace where all employees can perform their duties with dignity and without fear.

I call upon all employees to familiarize themselves with the provisions of this policy and to extend their full cooperation in its effective implementation. Creating and sustaining a safe workplace is not only a statutory requirement but also a collective responsibility that strengthens the organizational fabric and enhances efficiency, productivity, and trust.

The Policy is available in Marathi, Hindi and English versions.



(S.C. Mudgerikar)
Chairman and Managing Director

Date: 20.10.2025

Place : Mumbai



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED

(Government of India Undertaking)

Policy on Prohibition, Prevention and Redressal of Bullying, Harassment and Sexual Harassment at Workplace

COMPANY POLICY:

Rashtriya Chemicals and Fertilizers Limited (Company) as an employer is committed to creating a respectful, inclusive, healthy and safe work environment that enables employees to work free from unwelcome, offensive and discriminatory behaviour. The aim is to enable them to deliver their best at work without fear of prejudice, bias, bullying, harassment and / or sexual harassment. The Company recognizes consequences of bullying, harassment and sexual harassment and that it can subject individuals to fear, stress and anxiety.

Sexual harassment at the workplace is a form of discrimination. Protection against sexual harassment and right to work with dignity are universally recognised human rights by international conventions and instruments. Therefore, in order to deal with sexual harassment at workplace the Company has set out a **Policy on Prohibition, Prevention and Redressal of Bullying, Harassment and Sexual Harassment at Workplace (Policy)**.

The Policy aims to prevent / prohibit and / or redress any incident of sexual harassment and to enforce strong disciplinary action in face of any such occurrence. It defines sexual harassment and provides a framework to deal with complaints of sexual harassment at the workplace or related to the workplace.

Further, any form of bullying, harassment or sexual harassment whether overt or covert is therefore unacceptable and regarded as misconduct as per this Policy. It explicitly prohibits bullying, harassment or sexual harassment at work place or off site, either during or in connection with activities related to work.

The Company has Zero tolerance to Bullying, Harassment or Sexual Harassment and will take action consistent with this policy and applicable laws against any person found to have breached this Policy. The Company will also take steps to comply with any specific laws relating to this issue.

The Company is committed to ensure that bullying, harassment or sexual harassment instances and incidents can be reported without fear of reprisal or retaliation. The Company will investigate instances / and or complaints of bullying, harassment or sexual harassment promptly and discreetly. The Company will initiate action as per the details provided in this Policy.

Presiding Officer - JC

Page 1 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

The Company is an equal opportunity employer and therefore all employees (irrespective of their gender) have equal rights under this policy. The Company seeks to build an environment where everyone is welcome and can feel a sense of belonging.

This Policy draws from the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" of India (hereinafter referred to as the "Act") and existing rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013" (hereinafter referred to as the "Rules").

It is the responsibility of all those connected with the Company to comply with this Policy.

This Policy will supersede all previous policies / guidelines / notices / circulars, etc. issued on the subject matter.

OBJECTIVES:

- a) To provide work environment free from fear, reprisal, coercion, discrimination, bullying and harassment of sexual nature
- b) To express zero tolerance to any bullying, harassment or sexual harassment at workplace through Prohibition, Prevention, Resolution and Deterrence of acts of bullying, harassment or sexual harassment
- c) To enable all those working, associated and visiting the Company to raise their concerns and make complaints without any fear
- d) To define sexual harassment and provide a clearly stated codified redress for any sexual harassment occurring at workplace
- e) To provide a procedure for resolution, settlement or prosecution in case of complaints of bullying, harassment or sexual harassment
- f) To conduct fair investigation and reach a reasonable decision in a timely manner

SCOPE

The Policy applies to all employees of the Company.

The Policy will be incorporated in the service conditions of all employees explicitly or by inferences and will come into effect immediately. All parties connected with the Company are mandated to follow this Policy and to work collaboratively to prevent bullying, harassment or sexual harassment.

2nd
Presiding Officer - IC



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED

(Government of India Undertaking)

All employees are required to follow professional protocols and etiquette while interacting with seniors, colleagues, juniors, customers, vendors, associates or any other stakeholders at all times (irrespective of the mode of interaction i.e. in-person, at office, remote, virtual, etc.)

DEFINITIONS:

a) Aggrieved person:

- i. **Sexual Harassment** :Any person who complains of sexual harassment which includes regular, temporary, ad hoc or daily wage basis employees. They include casual workers, contract workers, consultants, retainers, probationers, trainees, interns and apprentices or called by any other such name engaged by the Company. They could be appointed either directly or through an agent including a contractor. It could be with or without knowledge of the Company. The terms of employment could be expressed or implied.
This also applies to all vendors, contractors, customers, agents and suppliers who do business with the Company and/ or visit the employees of Company.
- ii. **Bullying and Harassment:** Any RCF Employee who complains of Bullying/ Harassment.

b) Respondent: Any person (employed, associated or visiting the Company) against whom the aggrieved person has complained

c) Workplace: Includes all plants / units / offices and branches of the Company as well as any place visited by the employee arising out of or during the course of the employment (for example site visit, visit to customer office / premises, vendor site visit, official events / parties / functions, trainings, workshops, official team outings / events, RCF Hospital, RCF Sports Complex, RCF Colony, RCF Club, or any other place construed extended workplace, etc.) including transportation provided by the Company for undertaking such journey.

In the **virtual workplace**, it shall include, but shall not be limited to:

- Physical or Digital space when an employee is connected for work, even if it is from office, home, co-working space, remotely (from anywhere) or in any manner whatsoever.

Subj
Presiding Officer - I.C

Page 3 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

- Telecom or other Communication channels – Phone, Internet, Chat, Email, Collaboration tools, Video/Audio Conference tools, Metaverse, etc.
- Publicly available social media, applications or other electronic tools if used to communicate between employees for both official and personal purposes like Slack, Telegram, WhatsApp, LinkedIn, Facebook, Telegram, Zoom, MS Teams, Google Meet, etc.

BULLYING

Bullying refers to repeated and unreasonable behaviour directed towards an individual or group that creates a risk to health and safety. Examples include:

- Verbal abuse, insults, or offensive language
- Spreading malicious rumours or gossip
- Excluding someone from workplace activities
- Intimidation, threats, or undue pressure
- Wrongful blame
- Work sabotage or undue interference
- Stealing or taking credit for ideas
- Spying, invasion of privacy, etc.

HARASSMENT

Harassment refers to any unwelcome conduct, based on a protected characteristic (such as race, gender, age, religion, caste, creed, disability, body shape, or sexual orientation, etc.), that creates a hostile, intimidating, or offensive environment. Examples include:

- Unwanted physical contact
- Offensive jokes or comments
- Displaying inappropriate or offensive materials
- Repeated unwanted invitations or attention
- Giving unrealistic deadlines, etc.

Bullying or Harassment may take the form of Sexual Harassment if it has sexual connotations / sexual element involved in it.

Guid
Presiding Officer - IC

Page 4 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED

(Government of India Undertaking)

SEXUAL HARASSMENT:

Sexual harassment includes such unwelcome sexually determined behaviour (whether direct or by implication) such as:

- a. Physical contact and sexual advances;
- b. Demand or request for sexual favors;
- c. Sexually - coloured remarks ;
- d. Showing pornography; and
- e. Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about present or future employment status; or
- Interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health and safety

“Unwelcome sexually determined behaviour” includes but is not limited to:

- Subjecting another person to an unwelcome act of physical intimacy including grabbing, brushing, touching, including sexual flirtations, advances or propositions.
- Making any unwelcome remark with sexual connotations like sexually explicit, remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks, commenting on body shape or size, commenting on dressing, etc.
- Showing any sexually explicit visual material in the form of pictures / cartoons / pin-ups/ calendars / screen-savers on computers or laptops / any offensive written or electronic material / including pornography.

Subrat
Presiding Officer - Ic



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED

(Government of India Undertaking)

- Engaging in any other unwelcome conduct of a sexual nature, verbal or even nonverbal, staring to make the other person uncomfortable, making offensive gestures, etc.
- Sending unwelcome communication of a sexual nature, through e-mail, letter, mobile technology, social media platforms or any other form of written or electronic communication, exhibiting conduct of a sexual nature or sexting.
- Making an unwelcome demand or request whether directly or by implication for sexual favours and/or making it a condition of employment / payment of wages / increments/ promotion / preferential treatment / threat of detrimental treatment in employment / threat to current or future employment status or similar act.
- Where a person requests sexual favours from another person in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits or continued employment or threatens to terminate any such person for non-co-operation.
- Where a boss or any other person intrudes into the private life of employees or persistently asks them out, or makes other advances
- Where any employee makes sexual epithet, jokes, written or oral references to sexual conduct, and/or gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable
- Behaviour which has sexual undertones and creates an environment that is intimidating, hostile, offensive, humiliating for employees
- Stalking, Cyber-stalking, Following, Cornering, Voyeurism, Outraging the modesty, Molestation, Physical assault, Rape, etc.
- Improper / indecent dressing at the Workplace or extended workplace
- Demeaning / discriminatory / harassing behaviour in any form relating to gender, gender identity, sexuality, sexual orientation, age, body shape or size, physical appearance, etc.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy.

gud
Presiding Officer - JC

Page 6 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

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 person.**

Work from Home / Remote working

- Work-from-Home or Remote-work will be considered as Workplace and the Code of Conduct or Service Rules would apply in such situations also.
- When on a Video call or Audio call, all parties involved should make sure that proper environment, dressing etiquette is maintained.

COMPLAINT MECHANISM:

A) For Bullying and / or Harassment

The complaints of Bullying and / or Harassment should be made to the HR Department, Grievance Redressal Committee or any other Disciplinary Authority as defined in CDA/Standing Orders of RCF as applicable to Officers and Workmen. All such matters will be:

- Taken seriously and treated confidentially
- Investigated promptly, fairly, and impartially
- Resolved with appropriate corrective / disciplinary action, as may be prescribed

Any employee found to have engaged in bullying or harassment shall face disciplinary action, up to and including termination of employment (as may be appropriate in the situation).

B) For Sexual Harassment

For time-bound redressal of the complaints of Sexual Harassment made by the aggrieved person, the Company has created an appropriate complaint mechanism in the form of "Internal Committee" as required under the Act and the Rules.

INTERNAL COMMITTEE (IC):

A) The "Internal Committee" shall consist of the following:

1. Presiding Officer, who shall be a woman employed at a senior level;

Presiding Officer-IC

Page 7 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

2. At least 2 members from amongst the employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;

3. One member from amongst External Agency / NGOs or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment;

B) Provided that at least one-half of the total members so nominated shall be women

C) The Presiding Officer and every member of the IC shall hold office for such period, not exceeding 3 years, from the date of nomination as may be prescribed by the employer. However, the IC members shall be eligible for re-nomination, unless otherwise prescribed.

D) The names of the members of the IC shall be notified by the HR Department.

E) The committee shall be responsible for:

- Ensuring Compliance with the Act and Rules and creating a workplace free from any form of Sexual Harassment
- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

Any instance of Sexual Harassment reported by an employee should be taken up seriously and handled sensitively.

F) All Complaints of Sexual Harassment should be addressed to the Internal Committee and should be dealt with by the Committee confidentially and on priority.

24/12/1
Page 8 of 13

Presiding Officer - IC

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

In case, sexual harassment complaint is submitted to HoD/ Manager /HR or any person other than the Internal Committee the same should be forwarded to the Presiding Officer of the IC immediately for next steps.

AWARENESS

1. Awareness sessions shall be organized by the Company to widely disseminate the internal policy for prohibition, prevention and redressal of bullying, harassment and sexual harassment at the workplace, sensitizing the employees with the provisions of the law and reporting channel
2. Orientation programs and skill building programs for the Members of the IC shall also be organized by the Company
3. This Policy and the names and contact details of all the Members of the IC shall be widely disseminated and publically available

COMPLAINT

The aggrieved person may make, in writing, a complaint of sexual harassment (in six hard copies or an e-mail addressed to the Presiding Officer of the Internal Committee) at the workplace to the IC, within a period of 90 days from the date of incident and in case of a series of incidents, within a period of 90 days from the date of the last incident being reported.

The IC will render reasonable assistance to aggrieved person for making the complaint in writing.

This time limit may, at the discretion of the IC, further be extended for a period up to 90 days if the IC is satisfied that there were circumstances that prevented the aggrieved person from filing a complaint within the specified timeline.

Please note that the IC shall not entertain any Anonymous Complaints.

Internal Committee shall have same power as vested in Civil Court under the Code of Civil Procedure, 1908:

- a) Summoning and enforcing the attendance of any person and examining him on oath;

gupt

Presiding Officer - IC

Page 9 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

- b) Requiring the discovery and production of documents; and
- c) Any other matter which may be prescribed.

PROCEDURE FOR FORMAL GRIEVANCE REDRESSAL:

1. The IC shall ensure that the complaint is attended to within 07 working days after receiving it and that the investigations are completed within 90 days.
2. **CONCILIATION AND SETTLEMENT:** Before initiating an inquiry, the IC may, at the request of the aggrieved person, take steps to arrive at a settlement between the parties. However, no monetary settlement can be made as the basis of such conciliation. Where a settlement has been arrived between the parties, the same shall be recorded by the IC and copies of the settlement will be given to the aggrieved person and the respondent.
3. Once such settlement has been arrived at no further enquiry shall be conducted by the IC, however, the aggrieved person can further refer the same to IC for redressal if the terms of settlement have not been complied.
4. In the event that the complaint is not being resolved through conciliation and settlement process, the IC would conduct an inquiry into the matter (as per procedure prescribed in the Act and the Rules)
5. Generally, the inquiry shall be made in physical mode. However, in exceptional circumstances like lockdown or other unforeseen / emergency situations, where a physical inquiry cannot be conducted, Internal Committee may use Video Conferencing / virtual tools to conduct the inquiry.
6. The IC, while conducting the inquiry into the complaint referred to it, will call upon both the parties separately, listen, look at proof (if any), verify documents produced by the parties, allow the parties to produce witnesses and to put forth their say. Both the parties during the course of enquiry shall be given an opportunity of being heard. The IC shall follow the Principles of Natural Justice while dealing with the Complaint.
7. At the end of the inquiry, the IC shall prepare a report of findings on the complaint along with its recommendations and submit it to the Disciplinary Authority within 10 days from the date of completion of inquiry. A copy of the report shall be made available to the respondent and the aggrieved person also.

Presiding Officer - IC

Page 10 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

8. During the pendency of an inquiry, on a written request made by the aggrieved person, the committee may recommend to the Disciplinary Authority, to
 - Transfer the aggrieved person and / or respondent to any other location of work
 - Grant leave to the aggrieved person up to the period of 3 months (over and above the entitled leave)
 - Grant such other relief to the aggrieved person as may be prescribed
9. The implementation of the recommendations of IC by the Disciplinary Authority (DA) should be done within 60 days of receipt of such recommendation and copy of decision of the Disciplinary Authority shall be provided to aggrieved person within 15 days of its receipt.
10. During the inquiry, if the IC observes that any witness / person who is an RCF Employee has given false evidence or produced a misleading or forged document, it may recommend to the concerned Disciplinary Authority to take suitable action against such witness / person.
11. Pursuant to a finding of Sexual Harassment by the IC against any person accused of the same, the Committee may recommend to the DA to take action as a misconduct in accordance with CDA Rules/ Standing Orders/ POSH Act & Rules or as the IC may deem fit in the situation.
The IC may also recommend to deduct an amount as it may consider appropriate from the salary or wages of the accused person to be paid to the aggrieved person.
12. In case the respondent is a third party or any outsider, and not an employee of the Company or under its direct / indirect control, the Company will take all necessary steps and assist the aggrieved person in terms of support and preventive action and taking suitable recourse under the law.
13. The IC will protect the identity of all individuals involved during the process, including the aggrieved person, respondent, witnesses and contents of complaints and inquiry proceedings.
14. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.
15. The IC shall follow the Rules framed under the Act, the DoPT guidelines, if any issued on this matter, as well as the Procedure for conducting POSH complaints at RCF

Subj
Presiding Officer - IC

Page 11 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

Limited (Approved by the Board vide item No. 478.2.5 dated 05.09.2024 and Circular no. 1498 dated 16.09.2024, or any amendment thereof) as may be in force from time to time.

CONFIDENTIALITY

The IC, the aggrieved person, the respondent, the witnesses as well as any person associated with the process / complaint will protect the identity of all individuals involved during the process, including the aggrieved person and respondent and contents of complaints and inquiry proceedings.

All information received shall be kept confidential. Any person who breaches confidentiality shall be subject to disciplinary action and / or financial penalty as prescribed under the Act and Rules.

COMPLAINTS MADE WITH A MALICIOUS INTENT

On investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

The IC arrives at a conclusion that allegation against the respondent if malicious or complaint is false or the complainant has produced any forged or misleading documents, the IC may recommend the Disciplinary Authority to take action against complainant as per CDA rules/ Standing orders/ POSH Act & Rules or as the IC may deem fit in the situation.

In case CDA rules/ Standing orders is not applicable to the complainant, then IC may recommend filing of police complaint against the complainant, provided the malicious intent on the part of the complainant is established after an enquiry in accordance with procedure prescribed before any action is recommended.

In case malicious intent is proved, apart from action that may be taken against the complainant, leaves if any granted to the complainant on the recommendation of IC shall be adjusted against his/her leave balance.

APPEAL

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the Appellate Authority as described in the

3401
Presiding Officer - IC

Page 12 of 13

CONTROLLED COPY



RASHTRIYA CHEMICALS & FERTILIZERS LIMITED (Government of India Undertaking)

CDA Rules/ Standing Orders or in accordance with the Act or the Rules framed thereunder, within 90 days of the recommendations being communicated.

PROHIBITION OF RETALIATION

The Company shall ensure that no victimization or retaliation is allowed against the aggrieved person, witness (es), IC members or any other person(s) who participated in the investigation process. Any such act will be dealt with strictly.

MONITORING AND EVALUATION

ED (HR) shall ensure the monitoring and effective implementation and compliance of the rules procedure and regulation of the POSH Act.

POLICY REVIEW AND INTERPRETATION

This policy shall be reviewed regularly and updated in accordance with any amendments to the Act, Rules, government guidelines, etc. The ED (HR)/ Directors reserves the right to modify, delete, and / or add contents to this policy at any point in time without prior intimation.

The ultimate interpretation of this policy rests with ED (HR)/ Directors. The decision of the ED (HR)/ Directors shall be final and binding.

The Policy is translated in Hindi and Marathi language. In case of any discrepancy, the provisions / interpretation as per English version of the Policy shall prevail.

(S.C.Mudgerikar)
Chairman and Managing Director

Date: 20.10.2025

Place: Mumbai



Rashtriya Chemicals and Fertilizers Limited
(A Government of India Undertaking)

Zero Tolerance to Sexual Harassment at Workplace



No

Physical Contact
&
Advances



No

Demand or
Request for
Sexual Favours



No

Making Sexually
Coloured
Remarks



No

Showing
Pronography



No

Physical, Verbal or
Non-verbal conduct
of sexual nature

241021

CONTROLLED COPY