

**RADIANT CASH MANAGEMENT SERVICES**  
**CHENNAI**



**POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH)**

**At WORKPLACE**

**RCMS/MS/02**

**Doc Revision No: 2.0**

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## 1. Our Commitment

Radiant is committed to ensuring that all persons engaged with Radiant, work in an environment that is inclusive and provides an opportunity to bring their best selves at workplace. Radiant is committed to creating a healthy work environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace, to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin or disability. It also provides a work environment that ensures every person at the workplace is treated with dignity, respect and equal treatment. Radiant directs its actions to ensure that everyone who visits our workplace experiences an environment that not only promotes diversity and equality but also mutual trust, equal opportunity and respect for human rights.

Radiant does not tolerate any form of discrimination, victimization, or harassment including Sexual Harassment and it is committed to take all necessary steps to ensure that nobody is subjected to any kind of harassment.

This Policy on Prevention of Sexual Harassment (POSH) [“Policy”] is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 [“Act”] and the Rules framed thereunder which is aimed at providing every woman at the workplace a safe, secure and dignified work environment. Radiant is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages Equal Opportunity.

Radiant prohibits its employees from engaging in any direct/indirect behaviour that is offensive, intimidating, malicious or insulting. This includes any form of harassment or bullying, whether individual or collective.

## 2. Introduction

At Radiant, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with all stakeholders. This means that employees have a responsibility to:

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behavior that has sexual connotation
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed, to appropriate authorities and abide by the complaint handling procedure of the company.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 was enacted to ensure safe working spaces for women and to build enabling work environments that respect women's right to equality of status and opportunity. An effective implementation of the Act will contribute to the realization of their right to gender equality, life and liberty, equality in working conditions everywhere. The sense of security at the workplace will improve women's participation in work, resulting in their economic empowerment and inclusive growth.

If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

### 2.1 Scope

This policy applies to all categories of employees of Radiant, including permanent, Management and workmen, temporaries, trainees and employees on contract at its workplace. Radiant will not tolerate sexual harassment, if engaged in by customers or any other business associates. The workplace includes:

- All offices or other premises where Radiant's business is conducted
- All company-related activities performed at any other site away from Radiant's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

## 2.2 Definitions

- "Act" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed there under.
- "Aggrieved Person" means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- "Company" means Radiant Cash Management Services Limited.
- "Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- "Internal Complaints Committee" means a committee constituted by Radiant as per the Act, the Sexual Harassment of Women at Workplace (Prevention, Prohibition, Redressal) Act, 2013.
- "Respondent" means a person against whom the aggrieved person has made a complaint.
- "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) but not limited to:

- o Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
  - Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
  - Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
  - Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will
  - Demand or request for sexual favours.
  - Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
  - Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
  - 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.
  - Repeatedly asking to socialize during on-duty/ off-duty hours or continued expressions of sexual interest against a person's wishes
  - Giving gifts or leaving objects that are sexually suggestive
  - Eve teasing, 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
  - 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 behaviour amount to sexual harassment:
  - o Implied or explicit promise of preferential treatment in employment
  - o Implied or explicit threat of detrimental treatment in employment
  - o Implied or explicit threat about the present or future employment status
  - o Interference with the person's work or creating an intimidating or offensive or hostile work environment
  - o Humiliating treatment likely to affect health or safety.

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 person/people, but on the experience of the aggrieved woman.

It is to be noted that the Sexual Harassment at Workplace is a behaviour that is unwelcome and is sexual in nature. It is a subjective experience and often occurs in matrix of power. It is the impact on the Complainant/aggrieved Woman (person who has complained) that matters and not the intention of the Respondent (person against whom the complaint is made).

## 3. Complaint Mechanism

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

### 3.1 Internal Complaints Committee (ICC)

Every complaint received shall be forwarded to the Internal Complaint Committee formed under the policy for redressal. The investigation shall be carried out by the Internal Complaints Committee constituted for this purpose.

The following are the members of the ICC for Radiant Cash Management Services.

# POSH Policy



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S.No.	Name	Designation	Contact details – Mobile & Email ID
1.	Dr. Renuka David	Presiding Officer	Mobile: 9840982552 Email ID: md@radiantmedicalsolutions.com
2.	Col. Benz K Jacob	ICC member	Mobile: 9645012935 Email ID: benzjacob@radiantcashservices.com
3.	Dr. Angela David	ICC member	Mobile: 9500006448 Email ID: drangeladavid@radiantmedicalsolutions.com
4.	Ms. Shaila Junis	ICC Member	Mobile: 9940611266 Email ID: shaila@radiantcashservices.com
5.	Ms. Sagaya Malar Vizhi C	External Member	Mobile: 9841755557 Email ID: malar.chinnapan@gmail.com

The Presiding Officer and every member of the Internal Complaints Committee shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the employer.

## 4. Complaint Redressal Mechanism

This section elaborates the procedures for resolution, settlement or Prosecution of Acts of Sexual Harassment. Radiant is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

### 4.1 Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will



thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

## 4.2 Complaints

An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management.

At RCMS, we have Customized Our Complaint Redressal Mechanism.

- **She-Box:** A Secured Online Portal in Intranet/IMS (Internal Management System) where Employees can login and file the complaint with required details.
- **Dedicated POSH Helpline:** A confidential phone number (that remains with the HR) and a WhatsApp support line is also available for employees to seek immediate guidance.
- **QR Code:** A QR Code Under the Tab POSH is available in Intranet/IMS. Once Scanned, this QR Code will open a Google Form, where Employees can file the complaint with relevant and required details of the Harassment.

Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her/him within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the Internal Complaints Committee, for reasons to be recorded in writing.

- The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making a complaint in writing, in case they are unable to do so.

- The employee is required to disclose their name, department, division and location they are working in, to enable the ICC to contact them and take the matter forward.
- Complaint against any member of the Complaints Committee or employee in the Strategic Job Responsibility Band (or equivalent) and above, should be sent directly to the CMD of the Company.
- On receipt of complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the aggrieved woman and Respondent. The Internal Complaints Committee shall follow principles of Natural Justice while handling such complaints.
  - o Where the aggrieved person is unable to make a complaint on account of their physical incapacity, a complaint may be filed by:
    - a relative or friend; or
    - a co-worker; or
    - an officer of the National Commission for Women or State Women's Commission; or
    - any person who has knowledge of the incident, with the written consent of the aggrieved person.
  - o Where the aggrieved person is unable to make a complaint on account of their mental inability, a complaint may be filed by:
    - a relative or friend; or
    - a special educator or
    - a qualified psychiatrist or psychologist; or
    - the guardian or authority under whose care they are receiving treatment or care; or
    - any person who has knowledge of the incident jointly with any of the above.



- o Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.
  - o Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.
- Internal Complaints Committee, on receipt of such written complaint, may, if required, ask the aggrieved person to furnish additional information about the alleged harassment.
- The Complainant or person authorized on their behalf as per the above provision, shall make a complaint to the Internal Complaints Committee through the following mode:
  - o Copies of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee members through the contact details displayed in the Notice Board Brochure, dedicated e-mail ID for POSH complaints at Radiant Cash Management Services or through the dedicated phone line for POSH complaints.
  - o On receipt of such a complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days.
  - o The respondent shall file a reply within 10 working days from the receipt of the complaint along with a list of documents, names and addresses of witnesses.
  - o The Internal Complaint Committee shall investigate into the matter of the complaint in detail. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
  - o Written notes are to be taken while listening to the person by IC. When taking notes, complainants own words, where possible, are to be used accurately. Clear

description of the incident in simple and direct terms is prepared and details are confirmed with the complainant. - All notes are kept strictly confidential.

- o Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation. - The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.
- o Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.
- o During the enquiry process, the aggrieved person and the respondent shall refrain from any form of threat, intimidation or influencing of witnesses.
- o The Committee will conduct enquiry in accordance with the principles of natural justice and will ensure to give both parties, the aggrieved woman as well as the respondent, a right to be heard and present their case before the Committee.
- o The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- o Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or aggrieved woman remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte Order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
- o The Internal Committee must complete its investigation within a period of 90 days from the date of receiving the complaint.
- o The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

- o For conducting the enquiry, the quorum of the Internal Complaints Committee shall be of 3 members including the Presiding Officer and external member. The Internal Committee may, before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, the Internal Complaints Committee shall ensure that:
  - o Monetary settlement will not be made as the basis of conciliation.
  - o Where a settlement has arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of them.
- Where a settlement has arrived as mentioned here in above, no further enquiry shall be conducted by the Internal Complaints Committee.
- The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:
  - o Summoning and enforcing the attendance of any person and examining him under oath.
  - o Requiring discovery and production of documents.
  - o any other prescribed matter.
- During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:
  - o to transfer the aggrieved person or the respondent to any other workplace.
  - o grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled.

Provided, the aggrieved person has to tender justified reasons for such transfer or leave, such as threat to work in the workplace.

## 4.3 Action

- The Committee shall on completion of the enquiry provide a report of its findings and recommendations within 10 days from the date of completion of the enquiry to the following:
  - o Chairman and Managing Director of the Company
  - o Aggrieved Woman
  - o Respondent
- If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
- If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, or if such complaint is proved to be false or malicious, it shall recommend to take action for sexual harassment as a misconduct and this may include:
  - o Counseling,
  - o Written Warning to the respondent/aggrieved woman (in case of False allegations)
  - o Written formal apology to the aggrieved woman
  - o Withholding of promotions / increments
  - o Transfer from present location
  - o Suspension
  - o Termination / dismissal from employment
  - o Settlement from the respondent's income to the aggrieved woman.
  - o Any other action that the employer may deem fit.
- Such action will be taken within 60 days of receipt of the report by the management. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

*Note: For more details, refer to the pictorial representation of the process flow given in Annexure A.*

- The respondent or the aggrieved woman can re-appeal for investigations, if the findings of ICC are not satisfactory.

## **4.4 Confidentiality**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate under the circumstances.

## **4.5 Access to Reports and Documents**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

## **4.6 Protection to Complainant / Victim**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

## 5. Awareness

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- All employees shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
- A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction.
- The Company shall display the POSH brochure with the names of the Internal Complaints Committee members and their respective contact details at its every establishment at a conspicuous place.
- Carry out orientation programs and seminars for the Members of the IC.
- Conduct capacity building and skill building programs for the Members of the IC.
- Conduct workshops and awareness programs consistently for sensitizing the employees with the provisions of the Act.

## 6. Legal Compliance

The IC shall prepare an annual report in each calendar year, in such format as may be prescribed, and submit the same to the employer and the District Officer (as defined in the Act).

The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints enquired and closed during the year
- number of cases pending for more than 90 days



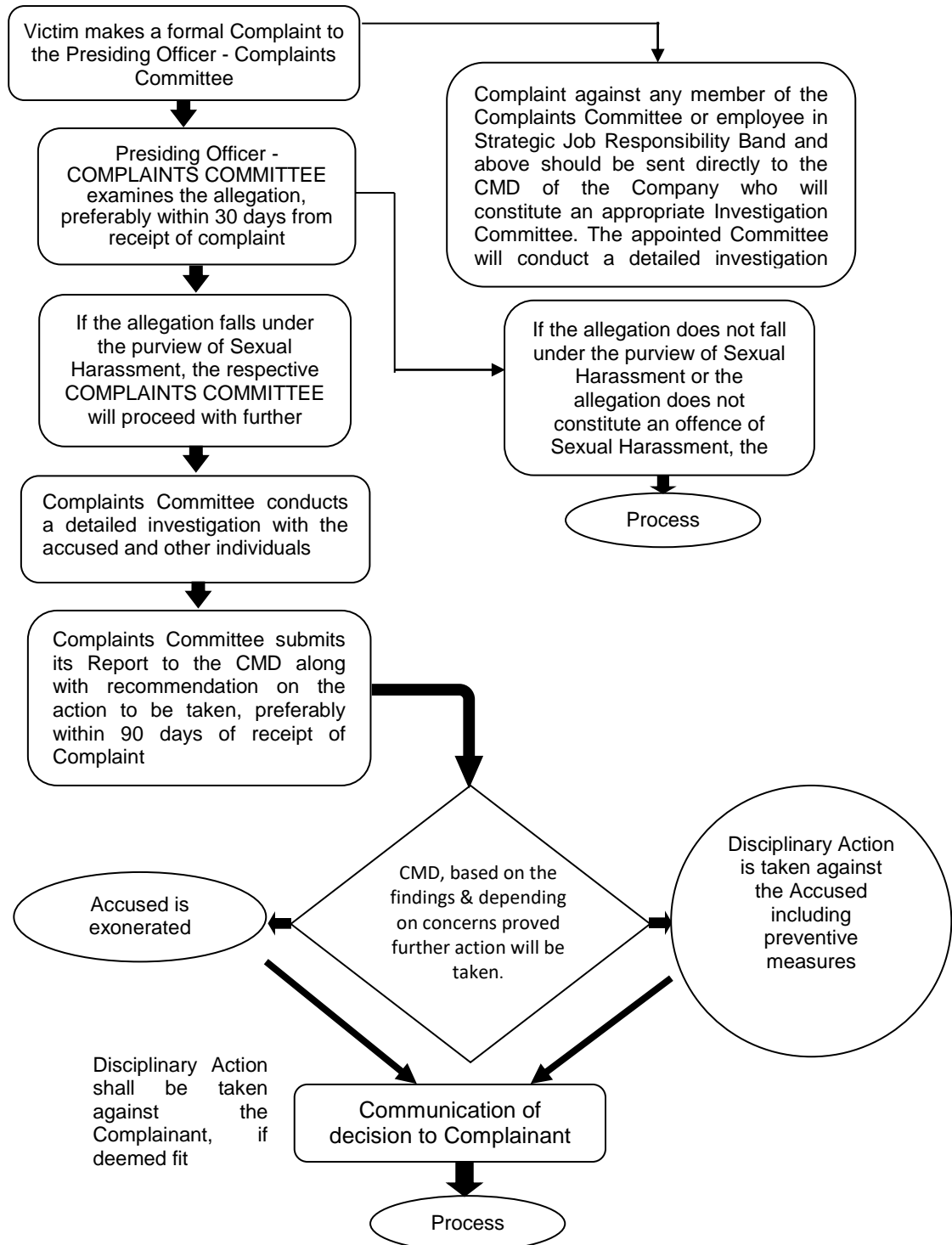


- number of workshops or awareness program against Sexual Harassment carried out
- nature of action taken by the employer or District officer.

## 7. Conclusion

In conclusion, Radiant Cash Management Services reiterates its commitment to providing its employees with a workplace free from harassment / discrimination where every employee is treated with dignity and respect.

## 8. ANNEXURE A



## 9. Records & Retention Period

Record	Retention Period
Complaints of sexual harassment, Report of ICC, Evidence, Compliant Tracker	Minimum 3 years
Contact details of Internal Complaints Committee members	Retain only the live and updated document
Annual report	Minimum 3 years
Evidence of workshops or awareness program	Minimum 3 years

## 10. Revision History

Revision Number	Author(s)	Description of Version	Date of Revision (dd-Mmm-YYYY)	Reviewed & approved by	Approval Date (dd-Mmm-YYYY)
1.0	Shaila Junis,/ Col. Benz K Jacob	Initial Version	13-Mar-2021	Board of Directors	06-Sep-2021
2.0	Nithya,/ Shaila Junis	Policy Revamped, Header, footer and Logo changed	01-Apr-2025	Board of Directors	23-May-2025