POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT

Bharat Global Developers Limited (the "Company") is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE

This Policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites.

The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

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

III. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical);

2. Demand or request for sexual favours;
3. Any other type of sexually-oriented conduct;
4. Verbal abuse or 'joking' that is sex-oriented;
5. Physical contact and advances including touching, stalking, sounds which have explicit and/or implicit sexual connotation/overtones, molestation;
6. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
7. Giving gifts or leaving objects that are sexually suggestive;
8. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and/or submission or rejection of the conduct is used as a basis for making employment decisions.

Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the person but on the experience of the aggrieved person.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this Policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM

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

The complaint mechanism is responsible for:

- Investigating every formal written complaint of sexual harassment;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment-related sexual harassment.

VI. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution

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.

Further when an aggrieved person is unable to make a complaint on account of physical/mental incapacity, a complaint may be filed by relative or close friend, or by guardian or other person who has the knowledge of the incident, or by any other authorized person in said subject matter. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaint mechanism for redressal of their grievances. The Complaint mechanism will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Formal Complaint Process

1. 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 Complaint mechanism constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Complaint mechanism will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaint mechanism determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaint mechanism.

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority. 5. The Complaint mechanism shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head-P&A as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head- P&A will ensure corrective action on the recommendations of the Complaint mechanism and keep the complainant informed of the same

Corrective action may include any of the following:

a. Formal apology
b. Counseling
c. Censure or reprimand
d. Withholding promotion and/or increments
e. Written warning to the perpetrator and a copy of it maintained in the employee's file.
f. Change of work assignment / transfer for either the perpetrator or the victim.
g. Suspension or termination of services of the employee found guilty of the offence

6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

VII. 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 investigatory process to the extent practicable and appropriate under the circumstances.

VIII. ACCESS TO RECORDS

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.

IX. PROTECTION TO COMPLAINANT

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.

X. CONCLUSION:

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

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INTERNAL COMPLAINTS COMMITTEE (ICC)

To prevent instances of sexual harassment pertaining to offices/ administrative units/ businesses and to receive and effectively deal with complaints, Internal Complaints Committee has been constituted for the Company.

COMPOSITION

1. Presiding Officer: A woman employed at a senior level in the organization or workplace

2. Two members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge

3. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

The law states that at least one half of the total members nominated being women.

RESPONSIBILITIES

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format

A quorum of three members is required to be present for the proceeding to take place. The quorum should include the Chairperson and at least two members, one of whom shall be lady.

Above formed committee should ensure that the grievances/redressal is solved as per the process laid down under Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013.

Also, committee should ensure that at least one meeting is conducted in a financial year for creating awareness.

LEGAL COMPLIANCE

The **IC** shall in each calendar year prepare, is such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). (Ref sec 21 of POSH) The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of 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