

POLICY ON PREVENTION OF SEXUAL HARRASSMENT

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Objective

Bombay Coated and Special Steels Limited ("**Company**") believes in creating a workplace where all employees are able to work free of any fear of prejudice, unfair treatment or bias whether based on gender or otherwise. The Company will not tolerate or condone Sexual Harassment (as defined hereinafter) at the Workplace (as defined hereinafter), as it is a violation of a woman's fundamental rights to life, equality, their right to live with dignity, and to practice any profession or to carry on any occupation, trade or business, which includes the right to a safe environment free from Sexual Harassment. It creates an unhealthy and unproductive atmosphere at the Workplace.

The Company expects its employees to behave in a dignified and respectful manner at the Workplace at all times. The objective of this Prevention of Sexual Harassment Policy ("**Policy**") is to provide protection against Sexual Harassment at Workplace and for the redressal of complaints of Sexual Harassment and for matters connected therewith.

The Company has zero-tolerance for Sexual Harassment. The Company values each and every employee working with it and wishes to protect their dignity and self-respect.

The Company is committed towards giving every employee a just and fair hearing on issues encountered by them at the Workplace with special attention to Sexual Harassment. The Company will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint. Sexual Harassment at the Workplace will be considered a grave offence, and the Company is committed to take all necessary action to ensure that its employees are not subjected to any form of harassment.

Scope

This Policy has been drafted keeping in mind the basic tenets of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**POSH Act**") and any amendments made thereto, read with the rules framed thereunder. This Policy will apply to all the Employees (as defined hereinafter) at the Workplace.

Annexure A of this Policy provides an indicative list of examples of behavior which may be found to constitute Sexual Harassment in the Workplace.

Definitions

For the purpose of this Policy, the following terms when capitalized shall have the meaning set out as follows:

"Aggrieved Woman" means a woman of any age, whether employed or not by the Company, who alleges to have been subjected to any act of Sexual Harassment at the Workplace.

"Employee" means any person employed at the Work Place for any work on regular, temporary, *ad hoc* or daily wage 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 person called by any such name.

“Respondent” means any person against whom the Aggrieved Woman has made a complaint.

“Sexual Harassment” means any one or more of the following unwelcome acts or behaviour, whether directly or by implication, namely:

- a) physical contact and advances, or
- b) a demand or request for sexual favours, or
- c) making sexually coloured remarks, or
- d) showing pornography, or
- e) any other unwelcome physical, implicit or explicit verbal or non-verbal conduct of sexual nature.

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 also amount to Sexual Harassment: (a) an implied or overt promise of preferential treatment in the Aggrieved Woman’s employment; (b) an implied or overt threat of detrimental treatment in the Aggrieved Woman’s employment; (c) an implied or overt threat about the Aggrieved Woman’s present or future employment status; (d) any interference with the Aggrieved Woman’s work or creating an intimidating or offensive or hostile work environment for the Aggrieved Woman; or (e) humiliating treatment likely to affect the Aggrieved Woman’s health or safety.

Any act of Sexual Harassment, whether committed within or outside of office hours will fall under the purview of this Policy.

“Workplace” means:

- a) all premises, locations, offices or units, established, owned and controlled by the Company, or
- b) any place visited by the Employee arising out of or during the course of employment including transportation, accommodation provided by the Company for undertaking such journey.

Internal Complaints Committee

An appropriate complaint mechanism in the form of an Internal Complaints Committee (**“ICC”**) in compliance with the POSH Act has been set up by the Company for time- bound redressal of any complaints of Sexual Harassment forwarded by the Aggrieved Woman. The ICC will comprise of the following members:

Presiding Officer, who shall be a senior level woman employee at the Company. In case a senior level woman employee is unavailable, the Presiding Officer shall be nominated from other offices of the Company. In case a senior level woman employee is unavailable in other offices, the Presiding Officer shall be nominated from any other workplace of the Company.

A minimum of 2 (Two) members from amongst the Employees at the Company’s office who preferably are committed to the cause of women or who have experience in the field of social work or having legal knowledge; and

One member from any non-government organization or association committed to the cause of women or a person familiar with issues relating to sexual harassment.

A list of members, as on the date of publication of this Policy, along with their contact details is annexed herewith at "Annexure B". Any updates to the said list would be appropriately circulated and made known to all Employees through notice from time to time.

The ICC members will be provided necessary training to handle such sensitive issues effectively and exhibit the required sensibility and concern.

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

The ICC shall be responsible for (a) investigating every formal written complaint of Sexual Harassment; (b) taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment; and (c) discouraging and preventing employment-related Sexual Harassment.

Complaints

If an Aggrieved Woman believes that she has been subjected to Sexual Harassment, the Company encourages such Aggrieved Woman to file a written complaint with the ICC. The complaint shall contain details of circumstances giving rise to the complaint, the date of alleged occurrences, names of witnesses, if any, and shall be signed by the Aggrieved Woman. At the time of filing the complaint, the Aggrieved Woman shall submit 6 (Six) copies of the complaint along with supporting documents and the names and addresses of the witnesses to the ICC.

The written complaint with the aforementioned particulars may be submitted physically to any ICC member or electronically by the Aggrieved Woman within a period of 3 (Three) months from the date of the incident and in case of a series of incidents, within a period of 3 (Three) months from the date of the last incident. However, the ICC reserves the right to extend the aforementioned time period further by not more than 3 (Three) months, if it is satisfied that the circumstances were such which prevented the aggrieved Woman from filing a complaint within the aforementioned period. Such reasons for extension in time should be recorded in writing by the ICC.

In case that the Aggrieved Woman cannot make such complaint in writing, the Presiding Officer/the Chairperson or any member of the ICC shall render all reasonable assistance to the Aggrieved Woman for making the complaint in writing.

Where the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:

- a) her relative or friend
- b) her co-worker
- c) an officer of the National Commission for Women or State Women's Commission
- d) any person who has knowledge of the incident, with the written consent of the Aggrieved Woman.

Where the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:

- a) her relative or friend
- b) a special educator
- c) a qualified psychiatrist or psychologist
- d) the guardian or authority under whose care she is receiving treatment or care, or
- e) any person who has knowledge of the incident jointly with her relative or friend, a special educator, a qualified psychiatrist or psychologist, or the guardian or authority under whose care she is receiving treatment or care.

Where the Aggrieved Woman 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 the written consent of the Aggrieved Woman.

Where the Aggrieved Woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the consent of the legal heir of the Aggrieved Woman.

Conciliation

Prior to initiating an inquiry into the complaint made, the ICC may, at the Aggrieved Woman's request, take steps to settle the matter between the Aggrieved Woman and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of such conciliation.

In the event that a settlement has been reached, the ICC shall record the settlement so arrived and forward the same to one of the directors of the Company, to take actions specified in the recommendation.

The ICC shall also provide the copies of the settlement as recorded to the Aggrieved Woman and the Respondent. Once a settlement is arrived at, no further inquiry shall be conducted by the ICC. However, the Aggrieved Woman can further refer that complaint to the ICC for redressal, if the terms of settlement have not been complied with. In such a case, the ICC shall commence an inquiry into the complaint.

Inquiry Process

The ICC is required to make an inquiry into the complaint filed by the Aggrieved Woman in accordance with the principles of natural justice. In conducting the inquiry, a minimum of 3 (Three) members of the ICC including the Presiding Officer/the Chairperson are required to be present.

The inquiry process has been set out below:

- a) On receipt of the complaint and where the Respondent is an Employee, the ICC shall send one of the copies received from the Aggrieved Woman to the Respondent within a period of 7 (Seven) working days from the receipt of the complaint.
- b) The Respondent shall file his/her reply to the complaint along with his/her list of documents,

and names and addresses of witnesses, within a period not exceeding 10 (Ten) working days from the date of receipt of the copy of the complaint.

- c) The inquiry has to be completed within a period of 90 (Ninety) days from the receipt of the complaint from the Aggrieved Woman.
- d) Upon completion of the inquiry, the ICC shall prepare a report of findings based on the complaint received by it and submit it to one of the directors of the Company within a period of 10 (Ten) days from the date of completion of the inquiry and such report be made available to the concerned parties.
- e) The Company is required to act on the recommendations of the ICC within 60 (Sixty) days of its receipt.
- f) Appeal against the decision of the ICC to the appellate authority, court or tribunal, in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 Act is allowed within 90 (Ninety) days from the date of recommendations being communicated.

For the purpose of making the inquiry, ICC shall have the power to: Summon and enforce the attendance of any person and examining her/him on oath, and

- a) Require the discovery and production of documents

Interim Relief

During the pendency of an inquiry, on a written request made by the Aggrieved Woman, the ICC may recommend to one of the directors of the Company to take the following interim measures:

- a) transfer the Aggrieved Woman or the Respondent to any other workplace
- b) grant leave to the Aggrieved Woman for a period up to 3 (Three) months
- c) restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her confidential report, and assign the same to another Employee of the Company; or
- d) grant such other relief to the Aggrieved Woman as it may deem fit.

The leave granted to the Aggrieved Woman, as an interim relief, shall be in addition to the leave she would be otherwise entitled.

Punishment and Compensation

If the ICC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to one of the directors of the Company that no action is required to be taken in the matter. However, if the ICC is of the opinion that the allegation against the Respondent has been proved, it shall recommend to one of the directors of the Company:

- a) to take action for Sexual Harassment as a misconduct including a written apology, counselling, written warning to the perpetrator (with a copy maintained in the relevant Employee's file), reprimand or censure, transfer, withholding of pay rise or increments and/or promotion, transfer,

community service, suspension or termination depending upon the severity of the incident of SexualHarassment, or

- b) to deduct from the salary of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Woman.

Malicious Complaints

This Policy shall not be used by Aggrieved Woman for raising false or malicious complaints.

If the ICC arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved Woman has made the complaint knowing it to be false or the Aggrieved Woman has produced any forged or misleading document, the ICC may recommend to the Employer that appropriate disciplinary action be taken against suchAggrieved Woman or against the person making such complaint.

The action recommended by the ICC against the Aggrieved Woman in case of malicious complaint shall be similar to the ones proposed for the Respondent in case of substantiated complaints.

While deciding malicious intent, the ICC shall consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

Protection of the Aggrieved Woman

The Company recognizes the sensitivity attached to matters pertaining to Sexual Harassment and the importance of ensuring that the complaint and connected information is kept confidential. Therefore, to protect the interests of the Aggrieved Woman, confidentiality will be maintained throughout the investigatory process to the extent practicable.

The Company will provide security to the Aggrieved Woman if such a need is felt andtake necessary action against any Employee attempting to intimidate the Aggrieved Woman. This will help instil confidence in other Employees to come forward if they believe they have been subjected to Sexual Harassment.

The penal consequences of Sexual Harassment and the order constituting the ICC willbe displayed at conspicuous places in the Work Place (including the places the Employees of the Company frequent to help strengthen this Policy).

Miscellaneous

The Company shall in consultation with the ICC periodically review the provisions of this Policy and its implementation (taking into account practical problems, if any, facedby the ICC and/or the Company in the implementation of this Policy). The Company reserves the right to amend the provisions of this Policy, from time to time, as it deemsfit, subject to applicable law.

Any act of Sexual Harassment shall be considered as misconduct under the applicablepolicies and service rules of the Company and may lead to such action being initiatedincluding and up to termination of the Employee from employment.

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 during their initial induction.

Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other rules or law.

The ICC shall prepare an annual report with the following details and shall submit the same to the Company to include in its annual report:

- a) Number of complaints of sexual harassment received during the year
- b) Number of complaints disposed-off during the year
- c) Number of cases pending for more than 90 (Ninety) days
- d) Number of workshops or awareness program against sexual harassment carried out, and
- e) Nature of action taken by the employer

Confidentiality:

The strictest confidentiality will be observed, therefore restricting all information generated to the smallest possible group. It must be ensured that the process is brief and quick. Any attempt by the members of the POSH Committee or the witnesses or any other persons involved in the inquiry to discuss or disclose this information to anyone except those directly involved with the Complaint will be treated with disciplinary action. Further, all the POSH Committee Members, Head HR are required to maintain utmost confidentiality on all matters discussed under the purview of the POSH. This information will not be disclosed even to members of senior management who are not directly involved with the Complaint.

The contents of the complaint made the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the POSH Committee and the action taken on the Respondent shall not be published, communicated, or made known to the public, press and media in any manner. If the same is violated, the Company shall recover a sum of Rupees five thousand as penalty from such person or take action as per the provisions of the service rules. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Recommendations

The Company encourages all Employees to provide their recommendations/observations on this Policy.

All recommendations/observations may be forwarded to the Compliance department, compliance@bcsspl.in

Version History:

Version	Approved By	Approval Date	Effective Date
1 st Version	Board of Directors	25.02.2020	25.02.2020
2 nd Version	Board of Directors	21.03.2025	21.03.2025

Annexure A

Some examples of Sexual Harassment at the workplace

Visual Conduct:

- a) Leering
- b) Making sexual gestures
- c) Displaying sexually suggestive or explicit objects, pictures (still or moving), cartoons, graphic or posters in any manner, including as part of e-mail transmissions

Verbal Conduct:

- a) Whistling and catcalls
- b) Foul or obscene language
- c) Making or using derogatory comments which are sexual in nature
- d) Explicit discussions about sexual activities/behaviours
- e) Comments about a person's physical attributes
- f) Spreading rumours about another person's sexual activities/conduct and/or partners
- g) Jokes which contain offensive, obscene or lascivious content
- h) Sexual advances / Sexual propositions
- i) Sexual innuendo or double entendre

Written Conduct:

- a) Suggestive, obscene or propositioning letters, notes, greeting cards or invitations, including but not limited to those transmitted via e-mail
- b) Displaying pictures (still or moving), cartoons, graffiti or posters in writing, including but not limited to e-mail

Physical Conduct:

- a) Unwelcome touching
- b) Sexual assault
- c) Kissing / Hugging / Grabbing
- d) Coercing another person to participate in sexual intercourse or other sexual behaviours
- e) Impeding or blocking movements
- f) Any physical interference with normal work or movement
- g) Sexual gestures

Annexure B

Index of Members of the Internal Complaints Committee

Sr. No.	Name of Member	Position	Contact Details (Telephone number and E-mail)
1.	Ms. Bhawna Gupta	Presiding Officer	Tel: 9152202453 E-mail: accounts7@bcsspl.in
2.	Ms. Rishita Shah	Member	Tel: 9920787004 E-mail: shahrishita@hotmail.com
3.	Ms. Sonam Gupta	Member	Tel: 9029446251 E-mail: sonam.gupta@bcsspl.in
4.	Mr. Nishant Joshi	Member	Tel: 9594049939 E-mail: hrhead.wd@bcsspl.in
5.	Mr. Kiran Devlekar	Member	Tel: 9930713094 E-mail: k.devlekar@bcsspl.in