



BHATE & RAJE CONSTRUCTION CO PVT LTD

POSH (Prevention of Sexual Harassment) policy

We, at Bhate & Raje Construction Company Pvt. Ltd., as a responsible corporate citizen and well-reputed contracting organization, are committed to Prevention of Sexual Harassment (PoSH).

This policy is in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. The purpose of this policy is to prevent sexual harassment against women in the workplace and to protect them. We aim to provide a safe working environment for all our people.

This policy is applicable to all the members of the company including employer and those who are employed on regular, temporary, on a daily wage basis, etc.

The policy also extends to those who are not employees of the company such as customers, clients, visitors, interns, contract workers, suppliers, etc.

This policy is restricted to the business locations of the company and any external location visited by the employees during the course of employment whether inside or outside of India.

All the employees should have the personal responsibility to ensure that their behavior is not in contravention with the policy.

Sexual Harassment:

Any behavior which may be physical, psychological, graphical, emotional, verbal, written, electronic, gestures which are offending, etc. is defined as inappropriate by the policy. Any act of the person either intentional or not, should not offend the dignity of the other person. If done so then serious disciplinary action is taken against the person who has performed such act.

Sexual harassment (direct or by implication) includes:

- i. Any kind of unusual and unwelcome sexual requests or demand for sexual favors in return for employment, promotion, examination or evaluation of a person.
- ii. Stalking, displaying indecent posters, showing pornography, sending jokes, comments, messages which are inappropriate and sexual in nature, lurid stares, physical contact or molestation, inappropriate sounds, signs, questioning about person's private life or body, insults or taunts based on sex or any kind of communication either verbal or non-verbal which affects the performance of the individual.
- iii. Physical confinement against one's will and likely to interrupt the privacy of the person.

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- iv. Any act or conduct by a person who is in authority, which creates the environment at workplace hostile or intimidating to a person belonging to the other sex.

ICC (Internal Complaint Committee):

We, Bhate & Raje Construction Co Pvt Ltd, have an ICC and all the complaints regarding sexual harassment are dealt with the committee. The ICC comprises of six members among them half of the members are women, as follows.

Members of ICC:

1. A presiding officer, a women working at a senior level in the office
2. Any member who is committed to the cause of women
3. Any member of the company who has legal knowledge and experience in social work
4. An external member, any person familiar with issues related to sexual harassment.

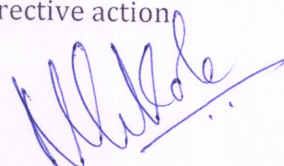
The complaints committee is responsible for receiving and investigating every complaint of sexual harassment, submitting findings and recommendation of the inquiry to the Management and coordinating with the Management before implementing any kind of appropriate action. The committee is also responsible to maintain confidentiality throughout the process.

Procedure for dealing with complaints:

The complaint is needed to be lodged within 3 months from the date of incident along with any documentary evidence or names of witnesses if available. The committee can also extend the timeline to another 3 months if it is satisfied with the reasons, which prevented the lodging of a complaint within the first 3 months. The complaint shall be in any form whether through phone or email but every oral communication should be followed up with the written communication and in any case where a complaint cannot be made in writing then the presiding officer or any member of the committee shall assist the person for making the complaint in writing.

In case if an aggrieved person is unable to lodge the complaint then any person who is having knowledge of the incident or any family member/ relative/ friend or co-worker can lodge the complaint on behalf of him/her. It is the responsibility of the person who receives the complaint to inform the committee members.

ICC can try and make parties to settle but monetary compensation is not the basis for settlement. If the aggrieved person is not, ready to settle then ICC will inquire into the complaint and both the parties will get a chance to be heard and complete the inquiry within 90 days. After the inquiry, if the person who committed such act is found guilty then the appropriate authority takes Corrective action.





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Corrective action includes

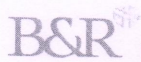
- i. Formal apology
- ii. Transfer of the person to other department
- iii. Suspension or termination of services of the employee found guilty for such offence
- iv. Counseling
- v. A written warning to the concerned employee and a copy of it are maintained in his record.

Reliefs to victims:

- i. Monetary compensation
- ii. Grant leave for 3 months
- iii. Transfer the victim to any other department where he/she feels safe to work

Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal in writing within 90 days of the recommendations being communicated



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