

BHATIA COMMUNICATIONS & RETAIL (INDIA) LIMITED

CIN: L32109GJ2008PLC053336

POLICY FOR ANTI SEXUAL HARASSMENT

1. POLICY

At Bhatia Communications & Retail (India) Limited (the “Company”) we believe to providing equal opportunity to every employee without any discrimination of race, gender, caste, religion, colour or maternity status. We are committed to provide safest working environment to our employees so our employees can work freely without any fear. The Company is committed to provide sexual harassment free work environment to employees.

Bhatia Communications & Retail (India) Limited has a policy of zero tolerance to any instance of sexual harassment and shall take all necessary steps to investigate and take necessary action with respect to such incidents

2. SCOPE

The Company has adopted this policy on anti-sexual harassment to comply with the requirements of the provisions of The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013. This act has come into force to protect the women against the sexual harassment at workplace and prevention and redressal of complaints of sexual harassment and matters ancillary and incidental thereto. This Policy is restricted to followings places for all the woman employees:

- At all business locations of the Company i.e. at Corporate Office, Branch Office, Plant, etc.
- Any other external location which is visited by the employees for Company’s work.
- Any mode of transport, if any, provided by the Company.

3. PRIMACY OF THE ACT

It is specifically provided that the provisions contained in the Act shall prevail wherever there is any conflict with this policy or where there is any doubt or clarification required on any aspect of the policy.

4. DEFINITIONS

i. Aggrieved Women:

An Aggrieved Women means

- in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

ii. Company:

Company means Bhatia Communications & Retail (India) Limited established under provisions of Companies Act, 1956.

iii. Complainant:

A complainant means any women who make a complaint alleging Sexual Harassment under this policy.

iv. Employee:

An employee means a person employed at workplace 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 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.

v. Sexual Harassment:

Sexual Harassment included any one or more of the following unwelcome acts or behaviour (Whether directly or implication) namely:

- (i) Physical contact and advances; or
- (ii) A demand or request for sexual favours; or
- (iii) Making sexually coloured remarks; or
- (iv) Showing pornography; or
- (v) Any other unwelcomed physical, verbal or non-verbal conduct of sexual nature

vi. Respondent:

A Respondent means the person against whom charges or complaint has been made or lodge.

vii. Workplace:

Workplace includes;

- (i) offices, premises, branches, Plants, units, locations or institutes which is established, owned and controlled by the Company.
- (ii) Any of the places which is visited by the woman employee for the Company's work or any of the work which has been handed over to her including Transport facilities which are provided by the Company.

5. Complaint Redressal Committee/ Internal Complaints Committee:

As per the requirement of provisions of "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Company has constituted Internal Complaints

Committee for protecting, prevention and redressal of sexual harassment of woman.
The constitution of Internal Complaints Committee is as below:

- Ms. Parishii Sanjeev Bhatia - Chairperson/ Presiding officer
- Mr. Prakash Marathe - Member
- Mr. Suraj Marathe - Member
- Ms. Sojal Harshita Ravindra

6. REDRESSAL PROCESS

- 6.1. Any aggrieved woman can make a complaint in writing, a complaint of Sexual Harassment to the Internal Complaints Committee (ICC), within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident. Provided where such complaint cannot be made in writing, the Presiding officer or any member of the Internal Complaints Committee, as the case may be shall render all reasonable assistance to the woman for making the complaint in writing. The ICC, may extend the time limit to further three months, if aggrieved person requested in writing to the ICC and satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
- 6.2. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise then following person can lodge complaint on behalf of her:
- her legal heir
 - her friends/ relatives
 - any other person who has knowledge of the incident, with the consent of an aggrieved woman
 - any officer of the National or State Woman Commission
- 6.3. An aggrieved woman can lodge complaint in writing as per **Annexure 1** to this policy. After filing the required details an aggrieved woman can submit the complaint to member of ICC or representative of particular location or can submit electronically by sending e- mail on csbhatia@bhatiamobile.com. Any oral complaint cannot be accepted under this policy. The Complainant shall submit four copies of the complaint along with supporting documents and details of the alleged incident(s), the name of the Respondent and names and addresses of the witnesses, if any.
- 6.4. The committee will maintain records of the complaints received and keep the identity of complainant confidential.
- 6.5. The Committee shall hold meeting and start inquiry into the complaint within Seven days from the receipt of complaint. At the first meeting Committee members shall hear the

Complainant and record her allegations. The Complainant can also submit supporting evidence in regards to her complaint to the Committee.

- 6.6. After recording statement of Complainant, Committee will call the person against whom complaint is made and opportunity of being heard shall be given to the respondent.
- 6.7. After hearing both the Complainant and Respondent if the complaint does not fall under the Sexual Harassment as define aforesaid, the same will be disposed. Upon examining the findings or evidence, if Committee is feels that complaint is forge or malicious then the Complainant shall be liable to appropriate disciplinary action as decided by the management.

7. INQUIRY:

- 7.1. After receiving complaint and recording statement and evidence from the Complainant, Committee would start inquiry and communicate the same to the person against whom the complaint is lodged.
- 7.2. Copy of the allegations shall be forwarded to the person against whom complaint is made.
- 7.3. The Complainant or the person against whom complaint is made if desires to call any witness in the particular case, then they can request the same to the Committee in writing.
- 7.4. The Complainant or the person against whom complaint is made wishes or desires to place any documentary evidence in the case, then they have to provide original copy of the said document to the Committee.
- 7.5. The Committee shall call upon the witness as requested by the complainant and respondent.
- 7.6. During the inquiry, Committee shall keep in view that reasonable opportunity of being heard is given to both the parties i.e. complainant and the person against whom the complaint is made.
- 7.7. Committee shall complete the inquiry within the period of three months and submit its report and recommendation to the Head HR of Bhatia Communications & Retail (India) Limited within ten days of completion of inquiry. Inquiry report shall also be communicated to both complainant and the person against whom complaint is made.
- 7.8. Head HR will take necessary actions as recommended by the Committee or as per the guidelines issued by the Supreme Court of India or as per the provisions of The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

8. PENAL PROVISIONS

1. If the Committee finds that Complaint which is made is under the preview of Indian Penal Code, then Committee will record the said fact in its report and management of the Company will lodge the Police Complaint in this regard for further proceeding.
2. ICC Committee may recommend the disciplinary action under The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 against the person against whom the complaint is made, if the said person is found guilty in the proceeding. Apart from this, Management of the Company may take additional actions as may arise under the Indian Penal Code.
3. Section 354A of the Indian Penal Code (IPC) deals with Sexual Harassment. Any case falls under this section is cognizable offence that means police officer can arrest the accused person without a warrant and start inquiry into the case.

Any man commits any of the following acts shall be guilty of Sexual Harassment.

- i) Physical contact and advances involving unwelcome and explicit sexual overtures or
- ii) A demand or request for sexual favours or
- iii) Showing pornography against the will of a woman of
- iv) Making sexually coloured remarks

Any man who commits offence of Sexual Harassment as described aforesaid in clause (i) or clause (ii) or clause (iii) and found guilty for the same shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or both under the privileged law.

Any man who commits offence of Sexual Harassment as described aforesaid in clause (iv) shall be punishable with imprisonment of which may extend to one year, or with fine, or with both under the privileged law.

Apart from above, acts of Sexual Harassment may also constitute other offences under IPC including Section 354 (assault or criminal force to women with intent to outrage her modesty), Section 354C (Voyeurism), Section 354D (Stalking), Section 375 and 376 (Rape) and Section 509 (word, gesture or act intended to insult the modesty of a woman).

9. REPORTING

The Company shall give the details of the number of complaints received and disposed of by the ICC under Sexual Harassment Act, 2013 in the Annual Report of the Company.

10. REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Board of Directors of the Company, subject to applicable laws, is entitled to amend, suspend or rescind this Policy at any time in line with the Listing Regulations. In case of any conflict between this policy and Act, Rules or Regulations or any other law as may be applicable such law shall prevail.

The updated policy shall be continuously hosted on the website of the company.

(This policy is revised by the Board of Directors at their meeting held on 27th March, 2025 and effective from 27th March, 2025)

Annexure 1

(Forms for making complaint of sexual harassment) (should be in four copies)

Date

To The members of

The Internal Complaint Committee

Bhatia Communications & Retail (India) Limited

Name of Complainant:

Work Location:

Department:

Person against whom complaint is made:

Brief description of incident or series of incident(s):
