

# BCB BROKERAGE PRIVATE LIMITED

## POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

### **Policy Statement:**

Our Company is committed to providing 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.

### **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.

### **What is sexual harassment?**

Under this Policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature like

- Unwelcome touching of a person's body, hair or clothing;
- Unwelcome sexual jokes or comments (including favourable comments about someone's gender, body, clothing, appearance, etc.);
- Disparaging remarks to a person about her gender or body;
- Asking about a person's sexual fantasies or sexual activities;
- Repeatedly asking for a date after the person has said "no";
- Implied sexual behavior, such as sexual gestures with hands or through body movements;
- Displaying sexually explicit posters or pictures;
- Electronic communications, such as phone calls, e-mails, text messaging and internet use, that violate this Policy.

The following actions will also be treated as sexual harassment under the policy:

- implied or explicit promise of preferential treatment in the victim's employment;
- implied or explicit threat of detrimental treatment in the victim's employment;
- implied or explicit threat about the victim's present or future employment status;
- conduct that interferes with the victim's work or create an intimidating or hostile work environment for her and
- humiliating treatment likely to affect the victim's health or safety.

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## **Internal Complaints Committee & their responsibilities:**

The Company has instituted an Internal Complaints Committee (ICC) for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the ICC will comprise of four members out of which at least two members will be of the same gender as that of the complainant:

The ICC is responsible for:

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

## **Complaint Reporting and Resolution:**

### **A. 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 victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC for redressal of their grievances. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### **B. Complaints**

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 ICC 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 ICC 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 ICC determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
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 ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director 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 will ensure corrective action on the recommendations of the ICC and keep the complainant informed of the same.
6. Corrective action may include any of the following:

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- a. Formal apology
  - b. Counselling
  - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
  - d. Change of work assignment / transfer for either the perpetrator or the victim.
  - e. Suspension or termination of services of the employee found guilty of the offence
7. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

The above policy was reviewed by BCB Brokerage Private Limited at the Board meeting held on 30-Sep-2021. The policy will be reviewed on an annual basis.