POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

Pursuant to Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013

Protection against Sexual Harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

The Company has zero-tolerance for sexual harassment and values each and every employee working and wish to protect their dignity and self - respect and hence, all concerned should take cognizance of the fact that the Company strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder (hereinafter referred to as ("the Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

Sexual harassment at the workplace results in violation of the fundamental rights of a woman;

- to equality under Articles 14 and 15 of the Constitution of India
- to life and to live with dignity under article 21 of the Constitution
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Bharat Wire Ropes Limited ("Company") is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace to all employees without regard to race, caste, religion, color, ancestry, marital status, gender, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity.

This Policy extends to all employees of Bharat Wire Ropes Limited including the Plant Locations at Atgaon and Chalisgaon or any other place(s) related to the company hereinafter referred to as 'Company' / 'Organization' in this policy. Local country laws will take precedence over this policy, in other geographies, if applicable.

This revised version of the policy is effective from 09th August, 2021, and supersedes all prior policies and communication on this matter.

I. DEFINITIONS:

a. "**Aggrieved woman**" means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subject to any act of sexual harassment by a Respondent.

b. "**Employee**" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 called by any other such name.

c. "**Employer**" means the Company.

d. "**Internal Complaints Committee**" means the committee constituted by the Company as per the Act.

e. "**Respondent**" means a person against whom the aggrieved woman has made a complaint.
f. "**Sexual Harassment**" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
    i. Physical contact and advances; or
    ii. A demand or request for sexual favors; or
    iii. Making sexually colored remarks; or
    iv. Showing pornography; or
    v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature.
g. No woman shall be subjected to sexual harassment at any workplace. Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:
    i. Implied or explicit promise of preferential treatment in their employment;
    ii. Implied or explicit threat of detrimental treatment in their employment;
    iii. Implied or explicit threat about their present or future employment status;
    iv. Interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
h. Humiliating treatment likely to affect the health and safety of the aggrieved person.
i. In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.
j. "**workplace**" includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit, any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

II. INTERNAL COMPLAINTS COMMITTEE (ICC):

The Internal Complaints Committee shall comprise of:

a. A Presiding Officer who shall be a woman employed at a senior level from amongst the Employees/Management/KMP.
b. Not less than 2 (two) members from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
c. One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Internal Complaints Committee will operate on the following guidelines:-

a. The person against whom the allegation of Sexual Harassment has been made by the aggrieved Woman Complaints Committee shall meet as and when any instance of violation of the policy is referred to the committee and in any case at least once in a year.
b. Internal Complaints Committee shall look into the number of cases filed and their disposal under the act to the Board.
c. The Presiding Officer and the members of the Internal Complaints Committee will hold the position upto three years from the date of their nomination or as may be decided by the Managing Director of the Company.

Every complaint received shall be forwarded to internal complaint committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee ("ICC") constituted for this purpose and said ICC will be look into the complaint received from Head Office, Corporate Office, Plant(s),

Branch or any other place(s) related to the company . ICC has been constituted of the following members as nominated by the Company:

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Sr. No.	Name of Member	Designation
1.	Ms. Ruhi Mittal	Presiding Officer/Chairperson
2.	Mr. Mansi Trivedi	Member
3.	Mr. Govinda Soni	Member
3.	Ms. Amita Karia	Member - External Member

Atgaon:

Sr. No.	Name of Member	Designation
1.	Ms. Mamta Uchil	Presiding Officer/Chairperson
2.	Mr. Arun Gupta	Member
3.	Mr. Sushil Sharda	Member
3.	Ms. Amita Karia	Member - External Member

Chalisgaon:

Sr. No.	Name of Member	Designation
1.	Ms. Aanchal Singh	Presiding Officer/Chairperson
2.	Mr. Rakesh Kumar Jain	Member
3.	Mr. Ashutosh Kumar Shrivastava	Member
4.	Ms. Amita Karia	Member - External Member

(The above composition was approved in the Board meeting held by the Company on 02nd November, 2026)

III. PROCEDURE FOR LODGING A COMPLAINT:

a. The Aggrieved Woman makes a complaint directly to the Presiding Officer of the Internal Complaints Committee. The Presiding Officer should be able to try & solve the grievance informally before escalating the matter to the formal Committee within a period of three months from the date of incident.
b. Where an 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, or (b) her co-worker, (c) an officer of the National or State Commission for Women, or (d) any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
c. Where an Aggrieved Women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by (a) her relative or friend, or (b) a special educator, or a qualified psychiatrist or psychologist, (d) the guardian, or (e) any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (iv) of this paragraph.
d. Where an Aggrieved Women, 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 Women.

e. The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the Internal Committee.

IV. PROCEDURE FOR INQUIRY INTO COMPLIANT:

The aggrieved woman or person authorized on her behalf as per the aforesaid provision, shall make a complaint to the ICC as per the Act.

a. At the time of filing the complaint, the complainant shall submit to the ICC, a copy of the complaint along with supporting documents and names and address of witness.
b. On receipt of such complaint, the ICC shall provide a copy of the complaint received from the aggrieved woman to the Respondent within 7 to 10 working days.
c. Respondent shall file his reply within a period not exceeding 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
d. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
e. The ICC must complete its investigation within a period of 90 days.
f. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.
g. For conducting the enquiry the quorum of the ICC shall be of 3 members including the presiding officer.

The ICC may before initiating an inquiry, and at the aggrieved woman's request, attempt to settle the matter through conciliation. However, ICC shall ensure that no monetary settlement shall be made as a basis of conciliation.

Where a settlement has been arrived as mentioned hereinabove, the ICC shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. The settlement terms shall be signed by both the parties and the ICC shall provide the copies of the settlement to the aggrieved woman and the respondent.

Where, a settlement is arrived as mentioned hereinabove, no further inquiry shall be conducted by the ICC. The Committee may, during such investigation, exercise the power of a civil court, vested in it, in respect of:

a. Summoning and enforcing the attendance of any person and examining him under oath;
b. Requiring discovery and production of documents;
c. Any other prescribed matter.

V. MANNER OF ACTION

a. The ICC shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties;
b. If the allegation against the respondent has not been proved, the ICC may recommend that no action needs to be taken in the matter;
c. Except in cases where service rule exists, if the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take any action for sexual harassment as a misconduct including;

d. Written apology to the complainant, warning, reprimand or censure;
e. Withholding of promotions, pay rise or increments of the Respondent, terminating the Respondent from service;
f. Undergoing a counseling session or carrying out community service.
g. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine;
h. Such action will be taken within 60 days of the receipt of report.

VI. ACTION FOR FALSE AND MALICIOUS COMPLAINTS:

Any complaint of sexual harassment shall be taken up with utmost seriousness by the Company. However, there shall be zero tolerance for any false and malicious complaint.

Except in cases where service rule exists, if the ICC comes to a conclusion that the allegation was made with malicious intent or the aggrieved woman or any other person making the complaint on behalf of the aggrieved woman produced false or forged or misleading documents to prove its case, the ICC may recommend the Employer to take action against the complainant who has made the Complaint. A similar recommendation to the Employer for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

VII. OBLIGATIONS OF THE MANAGEMENT:

The responsibilities and duties of the Employer are as under:

a. Provide a safe working environment.
b. Formulate and widely disseminate an internal policy or charter declaring prohibition, prevention and Redressal of sexual harassment at the workplace.
c. Display conspicuously at the workplace, the penal consequences of indulging in acts that may constitute sexual harassment and the composition of the ICC.
d. Declare the names and contacts details of all members of the ICC
e. Organize workshops and awareness programmes at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment and organizing orientation programmes for members of the ICC.
f. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry
g. Cause to initiate under the Indian Penal Code, 1860
h. Provide assistance to the aggrieved woman if she so desires to file a complaint in relation to the offence under the IPC or any other law for the time being in force
i. Treat sexual harassment as a misconduct under the service rules and initiate action for misconduct
j. Prepare an annual report with details on the number of cases filed and their disposal and submit the same to the concerned authority
k. Monitor the timely submission of reports by the ICC.

VIII. CONCLUSION:

The Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees.

The identity and address of the aggrieved woman, respondent and witnesses shall not be published or disclosed to the public or media.

The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that the Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or the Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available under law.

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