

BANSAL WIRE INDUSTRIES LIMITED

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE (POSH POLICY)

1. PURPOSE

1.1 Bansal Wire Industries Limited ("the Company") is committed to providing a safe, secure, inclusive, and respectful workplace free from sexual harassment, discrimination, intimidation, and victimization.

1.2 This Policy aims to:

- a) Prevent incidents of sexual harassment at the workplace.
- b) Prohibit any form of sexual harassment.
- c) Establish a fair, impartial, and confidential mechanism for redressal of complaints.
- d) Ensure compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and applicable rules.
- e) Promote a culture of dignity, equality, mutual respect, and professional conduct.

2. SCOPE

2.1 This Policy applies to:

- a) All permanent employees.
- b) Probationers.
- c) Trainees and apprentices.
- d) Contractual employees.
- e) Consultants and retainers.
- f) Temporary staff.
- g) Interns (paid or unpaid).
- h) Daily wage workers.
- i) Any woman visiting the workplace in connection with employment, business, training, or services.

2.2 This Policy applies to all workplaces of the Company, including:

- a) Corporate offices.
- b) Factories, plants, warehouses, and branch offices.
- c) Customer locations.
- d) Vendor premises.
- e) Company-sponsored events.
- f) Business travel.
- g) Training programs.
- h) Off-site meetings.
- i) Transportation provided by the Company.
- j) Virtual workplaces including emails, video conferences, messaging platforms, and other digital communication channels.

3. LEGAL FRAMEWORK

3.1 This Policy is framed in accordance with:

- a) The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- b) Applicable provisions of labour laws and company service rules.

4. DEFINITIONS

4.1 Aggrieved Woman

A woman of any age, whether employed or not, who alleges having been subjected to any act of sexual harassment at the workplace.

4.2 Respondent

A person against whom a complaint of sexual harassment has been made.

4.3 Employee

Any person employed at the workplace for any work on a regular, temporary, contractual, trainee, apprentice, consultant, or volunteer basis.

4.4 Workplace

Workplace shall have the meaning assigned under the POSH Act and includes all locations where official work-related activities are conducted.

4.5 Internal Committee (IC)

The committee constituted by the Company under Section 4 of the POSH Act for receiving and redressing complaints of sexual harassment.

5. DEFINITION OF SEXUAL HARASSMENT

5.1 Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- a) Physical contact and advances.
- b) Demand or request for sexual favours.
- c) Making sexually coloured remarks.
- d) Showing pornography.
- e) Any other unwelcome physical, verbal, non-verbal, written, electronic, or visual conduct of a sexual nature.

5.2 The following circumstances, among others, if connected with any act of sexual harassment, may constitute sexual harassment:

- a) Implied or explicit promise of preferential treatment.
- b) Implied or explicit threat of detrimental treatment.
- c) Implied or explicit threat regarding employment status.

- d) Interference with work performance.
- e) Creation of an intimidating, hostile, humiliating, or offensive work environment.
- f) Humiliating treatment affecting health or safety.

5.3 Illustrative examples include:

- a) Unwanted touching or physical proximity.
- b) Repeated requests for dates despite refusal.
- c) Sending sexually explicit messages, images, videos, or emails.
- d) Sexually suggestive comments or jokes.
- e) Staring, gestures, or offensive body language.
- f) Display of sexually offensive material.
- g) Online harassment through social media or workplace communication systems.

6. RIGHTS AND RESPONSIBILITIES

6.1 Responsibilities of Employees

All employees shall:

- a) Treat colleagues with dignity and respect.
- b) Refrain from engaging in sexual harassment.
- c) Cooperate with investigations.
- d) Maintain confidentiality.
- e) Report incidents witnessed or experienced.

6.2 Responsibilities of Managers and Supervisors

Managers shall:

- a) Promote a respectful workplace.
- b) Prevent inappropriate conduct.
- c) Report complaints promptly.
- d) Support investigations without bias.
- e) Ensure no retaliation occurs.

6.3 Responsibilities of the Company

The Company shall:

- a) Provide a safe workplace.
- b) Display POSH awareness notices.
- c) Conduct awareness and training programs.
- d) Constitute and maintain the Internal Committee.
- e) Assist complainants in filing police complaints where required.
- f) Ensure timely redressal.

7. INTERNAL COMMITTEE (IC)

7.1 Constitution

The Company shall constitute an Internal Committee consisting of:

- a) A Presiding Officer who shall be a senior woman employee.

- b) At least two employee members committed to women's causes or having legal/social knowledge.
- c) One external member from an NGO, association, or person familiar with issues relating to sexual harassment.
- d) At least 50% of the members shall be women.

7.2 Tenure

Members shall hold office for a period not exceeding three years from the date of nomination.

8. COMPLAINT REDRESSAL MECHANISM

8.1 Filing of Complaint

- a) A complaint shall be made in writing to the Internal Committee.
- b) The complaint shall ordinarily be filed within three months from the date of the incident.
- c) In case of a series of incidents, within three months from the date of the last incident.
- d) The Internal Committee may extend the limitation period by an additional three months if sufficient cause is demonstrated.

8.2 Assistance in Filing Complaint

Where the complainant is unable to make a written complaint, reasonable assistance shall be provided by the Internal Committee.

9. CONCILIATION

- 9.1 Before initiating an inquiry, the Internal Committee may, at the written request of the complainant, attempt conciliation.
- 9.2 Monetary settlement shall not be the basis of conciliation.
- 9.3 Where settlement is reached, the Internal Committee shall record the settlement and forward recommendations to Management.
- 9.4 No further inquiry shall be conducted unless terms of settlement are violated.

10. INQUIRY PROCESS

- 10.1 Upon receipt of a complaint, the Internal Committee shall initiate an inquiry in accordance with principles of natural justice.
- 10.2 Both parties shall be provided reasonable opportunity to present evidence and witnesses.
- 10.3 Inquiry shall ordinarily be completed within ninety (90) days.
- 10.4 The Internal Committee shall submit its report within ten (10) days of completion of inquiry.
- 10.5 Management shall act upon the recommendations within sixty (60) days.

11. INTERIM RELIEF

During pendency of inquiry, the Internal Committee may recommend:

- a) Transfer of either party.

- b) Leave up to three months for the complainant.
- c) Restriction of reporting relationships.
- d) Any other appropriate relief necessary to safeguard the complainant.

12. DISCIPLINARY ACTION

Where allegations are proven, disciplinary action may include:

- a) Written apology.
- b) Warning or reprimand.
- c) Counselling.
- d) Adverse performance remarks.
- e) Withholding promotion or increments.
- f) Transfer.
- g) Suspension.
- h) Termination of employment.
- i) Any other action under applicable service rules.

13. MALICIOUS OR FALSE COMPLAINTS

13.1 If the Internal Committee concludes that a complaint was made maliciously or with forged evidence, disciplinary action may be recommended.

13.2 Mere inability to substantiate a complaint shall not attract action against the complainant.

13.3 Lack of sufficient evidence shall not by itself imply a malicious complaint.

14. CONFIDENTIALITY

14.1 The Company shall maintain strict confidentiality regarding:

- a) Identity of complainant.
- b) Identity of respondent.
- c) Witness details.
- d) Inquiry proceedings.
- e) Recommendations and actions taken.

14.2 Unauthorized disclosure shall attract disciplinary action and penalties as prescribed under law.

15. PROTECTION AGAINST RETALIATION

15.1 No employee shall be subjected to retaliation, intimidation, discrimination, victimization, or adverse employment consequences for:

- a) Filing a complaint.
- b) Assisting in an inquiry.
- c) Acting as a witness.

15.2 Any retaliation shall be treated as misconduct and dealt with appropriately.

16. RECORDS AND REPORTING

16.1 HR shall maintain records of:

- a) Complaints received.
- b) Inquiries conducted.

- c) Recommendations issued.
- d) Actions taken.
- e) Training and awareness programs.

16.2 The Internal Committee shall prepare annual reports as required under the POSH Act.

17. TRAINING AND AWARENESS

17.1 The Company shall conduct regular awareness programs for employees.

17.2 Specialized training shall be conducted for Internal Committee members.

17.3 POSH Policy shall be communicated to all employees through induction programs and periodic awareness initiatives.

18. POLICY REVIEW

18.1 This Policy shall be reviewed at least once every two years or earlier if required due to:

- a) Changes in law.
- b) Organizational requirements.
- c) Audit observations.
- d) Management directives.

19. EXCEPTIONS

Any exception to this Policy shall require prior written approval of the Board of Directors and must remain compliant with applicable laws.

20. APPROVAL AUTHORITY

This Policy is approved by the Board of Directors of Bansal Wire Industries Limited.