

**ANTI SEXUAL HARASSMENT POLICY**  
**BSEL ALGO LIMITED**



## **POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH)**

BSEL ALGO Limited (hereinafter referred to as the “Company”) believes in providing an equal employment opportunity 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. Sexual harassment at the workplace or other than workplace if involving an employee or employees is a grave offense and is, therefore, punishable.

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

### **SCOPE**

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

### **DEFINITIONS**

**The following terms used herein shall have the meaning assigned to the term as under:**

<b>"Sexual harassment"</b>	Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals within the course of his/ her work who is not employed by the Company.  “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:
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- Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
  1. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
  2. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
  3. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will.
  4. Demand or request for sexual favors.
  5. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body.
  6. Display of pictures, signs with sexual nature/ connotation/ overtones in the work area and work-related areas.
  7. Showing pornography, making or posting vulgar/ indecent/ sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
  8. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's
  9. Giving gifts or leaving objects that are sexually
  10. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
  11. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
  1. Implied or explicit promise of preferential treatment in employment;
  2. The implied or explicit threat of detrimental treatment in employment;
  3. The implied or explicit threat about the present or future employment status;

	<p>4. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or</p> <p>5. Humiliating treatment is likely to affect health or safety.</p> <p>An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.</p>
<b>"Aggrieved woman"</b>	Aggrieved woman 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.
<b>"Respondent"</b>	Respondent means a person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy
<b>"Employee"</b>	Employee means a person employed at the workplace, for any work on a 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 a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.
<b>"Workplace"</b>	Workplace means Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company. Places visited by the Employee arising out of or during employment including official events, accommodation, and transportation provided by the employer for undertaking a journey.
<b>"Employer"</b>	Employer means A person responsible for management, supervision, and control of the workplace



## ROLES AND RESPONSIBILITIES

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Refusing to participate in any activity which constitutes harassment.
- Supporting the person to reject unwelcome behavior.
- Acting as a witness if the person being harassed decides to lodge a complaint.

## REDRESSAL MECHANISM

In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy. In case of a verbal complaint, the complaint must be reduced in writing by the receiver of the complaint and signatures of the complaint must be obtained or by dropping an email on [monika.bsel@gmail.com](mailto:monika.bsel@gmail.com).

## COMPOSITION OF INTERNAL COMPLAINTS COMMITTEE (ICC)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (ICC) has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. The ICC shall comprise of the following members mentioned below:

Sr. No.	Name	Designation	Email Id
1	Ms. Anamika Kamble	Presiding Officer	<a href="mailto:info@bsel.com">info@bsel.com</a>
2	Mr. Santosh Sambhu Tambe	Member	<a href="mailto:info@bsel.com">info@bsel.com</a>
3	Ms. Monika Dilipkumar Nathani	Member	<a href="mailto:monika.bsel@gmail.com">monika.bsel@gmail.com</a>

### The committee will be responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting an inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports on any case relating to harassment of women at the workplace
- To prevent instances of sexual harassment and to receive and effectively deal with complaints pert.



## **CONFIDENTIALITY NORMS**

The identity of the complainant, respondent, witnesses, statement and other evidence obtained in course of the inquiry process, recommendations of the committees, action was taken by the employer is considered as confidential materials and the same must not be published or must not be made known to the public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.