

SEXUAL HARASSMENT POLICY

Policy Statement

As a Company, we are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

BLS aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy.

Violation of this policy will call for strict disciplinary action up to and including termination.

“Sexual harassment” includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behavior” (physical, verbal or non-verbal conduct) of a sexual nature

“**Sexual Harassment**” would also mean:

I. **Quid pro quo sexual harassment**, which means something in return or an exchange of one thing for another.

- In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favors also amounts to sexual harassment. The act of ‘asking’ may either be verbal or implied

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and the 'sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome.

- For eg: Direct or implied requests or offers by any associate for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

II. Hostile work environment includes

- Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates.
- Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals
- It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

FILING A COMPLAINT

Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers or visitors, should first clearly inform the harasser that his/her behaviour is offensive or unwelcome and request that the behaviour stop.

If the behaviour continues, the employee must immediately bring the matter to the attention of his/her supervisor. If the immediate supervisor is involved in the harassing activity, the violation should be reported to that supervisor's immediate supervisor, the department personnel officer, or the employee relations coordinator. If a supervisor or personnel officer knows of an incident of sexual harassment, they shall take appropriate remedial action immediately. If the alleged harassment involves any types of threats of physical harm to the victim, the alleged harasser may be suspended with pay. During such suspension, an investigation will be conducted. If the investigation supports charges of sexual harassment, disciplinary action against the alleged harasser will take place and may include termination.

However, if the investigation reveals that the charges were brought falsely and with malicious intent, the charging party may be subject to disciplinary action, including termination.

DECISION AND ACTION

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred; prompt, remedial action will be taken. The unit HR representative will share the investigation details and the findings thereof with the appropriate functional Head HR and agree on the applicable disciplinary action.

This may include some or all of the following:

- Restore any lost terms, conditions or benefits of employment to the complainant.
- Discipline the accused. This discipline can include demotion, suspension, and termination.

The disciplinary action will be carried out by the concerned HR department. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained in the associate's folder, ensuring confidentiality.

This anti-sexual harassment policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

The Chairperson will share the details of all complaints received and redressed with the Corporate Ombudsman on a quarterly basis.

As per the "Provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, "the employer shall include in its report the number of cases filed, if any, and their disposal under this act in the Annual report of the company or where no such report is required to be prepared, intimate such number of cases, if any, to the district officer."

Further, if any employee is dissatisfied with management's response to his/her complaint, he/she may contact at below mentioned:

Gautam Aggarwal

CHRO

Phone: 91-11-45795002

E-mail Id gautam.a@blsinternational.net

Dated: 20th Jan 2025

INTERNAL COMPLAINTS COMMITTEE

You are hereby informed that under the Anti-Sexual Harassment Policy, we have appointed Ms. Jyoti Malhotra as a Head of the committee & Ms. Sonam Teotia as an Independent Member dated 20th January 2025. Ms. Harshita Bhalla & Mr. Nikhil Jalan will no more be acting as a Head of Committee & Independent Member respectively due to some personal reasons. With this the current ICC consists of:

Sr.	Member Name	Role
01	Ms. Jyoti Malhotra	Head of Committee
02	Ms. Namrata Yadhuvanshi	Member
03	Ms. Sonam Teotia	Member
04	Mr. Himanshu Sharma	Member
05	Advocate Ms. Meghna Sengupta	External Member

A compliant can approach any member of the committee with his/her written compliant. For emergency compliant you may use the following ID: icc@blsinternaitonal.net. You may also contact on the below mentioned number- 07290018235

Regards,

Prashant Khullar
Authorized Signatory