

Policy of Prevention of Sexual Harassment at the Workplace

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1. Preamble

- a) Providing a safe and congenial work environment for all employees is an integral part of the Company's employment policy. We, as a Company, respect the dignity of all employees regardless of their gender. In line with this, we expect responsible and dignified conduct from all employees at all levels, fostering mutual respect free of any gender bias.

Sexual harassment violates the fundamental rights of a Woman to equality under Articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution, including the right to work in a safe environment free from sexual harassment. In response to worldwide concerns about sexual harassment at the workplace, the Supreme Court of India (in its 1997 Judgment *Vis a Vis Vishaka vs. the State of Rajasthan*) has mandated that all Employers frame guidelines on the subject and establish an appropriate Redressal Machinery.

With this background, we are framing this policy to address issues related to Sexual Harassment in the workplace effectively.

- b) Biesse India 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 sexual harassment. The Company firmly believes that all employees have the right to be treated with dignity. Sexual harassment involving employees at the workplace or outside is a grave offense and is, therefore, punishable.

2. Objectives of the Policy

This policy has been formulated with the following intentions:

- a) Promote a safe, equal, and congenial work environment.
- b) Raise awareness among employees about what constitutes sexual harassment.
- c) Prevent and eradicate sexual harassment in the workplace.
- d) Provide a formal and informal relief mechanism for addressing complaints of sexual harassment.
- e) Establish an effective "Grievance Redressal Machinery" for issues related to sexual harassment.
- f) Define and clarify the implications and outcomes of confirmed sexual harassment cases.
- g) Provide an anti-retaliation policy to ensure protection for Complainants, Witnesses, Committee Members, and other employees involved in preventing and resolving complaints.

3. Scope and effective date

This policy applies to all employees of BIESSE India, including temporary, apprentice, trainees, in-plant trainees, and contract workers. It also covers any unwelcome behavior of a sexual nature, as mentioned in the policy, by any Customer/Supplier/Contractor, including their Agents, Supervisors, Managers, and their employees. This policy comes into effect immediately.

4. Definitions

4.1. Sexual Harassment: Sexual Harassment includes any one or more of the following unwelcome acts or behaviors (whether directly or implicitly):

- a) Unwelcome physical contact and sexual advances
- b) A demand or request for sexual favors
- c) Making sexually colored/motivated remarks
- d) Showing pornography
- e) Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

4.2. Unwelcome sexually determined behavior includes, but is not limited to:

- a) Subjecting another person to an unwelcome act of physical intimacy, including grabbing, brushing, and touching. This includes any kind of sexual flirtations, advances, or propositions.
- b) Making an unwelcome demand or request (directly or implicitly) for sexual favors, making it a condition of employment, payment of wages, increments, promotion, or any other direct or indirect gain.
- c) Making any unwelcome remark with sexual implications, such as sexually explicit remarks, cracking jokes, or using sentences with sexual connotations or making sexist or gender-biased remarks.
- d) Showing any sexually explicit or pornographic material in the form of pictures, cartoons, pin-ups, calendars, screen-savers, or any sexually offensive written or electronic material.

- e) Engaging in any other unwelcome behavior of a sexual nature, verbal or non-verbal, such as staring to make the other person uncomfortable, making offensive gestures, kissing sounds, etc.
 - f) Sending unwelcome communication of a sexual nature through any form of written or electronic communication.
 - g) Inquiring into the private life of employees or persistently asking them for their Company.
 - h) Making sexual jokes, or oral or written references to sexual conduct, and/or gossip regarding one's sexual life, commenting on an individual's body, or commenting about an individual's sexual activity to humiliate or make the other person uncomfortable.
 - i) Creating an intimidating, hostile, or offensive environment for members of one gender, thereby interfering with a person's ability to work.
- 4.3. **Workplace:** Any place where a working relationship and/or employer-employee relationship between the Company and the person exists.
- 4.4. **Employee:** Employee means a person employed at a 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 Company, 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.

5. Responsibility

- a) All employees of the Company have a personal responsibility to ensure that their behavior is in line with this policy.
- b) All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. Complaint Mechanism

Whether or not such conduct constitutes an offense under the law or a breach of the service rules, an appropriate complaint mechanism in the form of a "Complaints Committee" has been created in the Company for the timely redressal of complaints made by the victims.

7. Internal Committee

- a) The Management has constituted a Committee to consider and redress complaints of Sexual Harassment.
- b) The IC for Biesse India, Survey No.32, No. 469, Jakkasandra Village, Sondekoppa Main Road, Nelamangala, Bengaluru Rural District – 562 123 is as below from Jan-2023 to Dec-2024:

Position in the Committee	Name of the Committee Members	Contact Details
Chairperson	Mrs. Anasuya N.	Landline: 080-49489851 Email: anasuya.n@biesse.com
Subject Expert External	Mrs. Karuna S G.	Mobile: 97430 17224 Email: karuna.ccs@gmail.com
Member 1	Mr. Suresh S T.	Mobile: 99805 33990 Email: suresh.st@biesse.com
Member 2	Mrs. Vidya R Patil	Landline: 080-49489802 Email: vidyapatil.r@biesse.com

- c) The IC for Biesse India, Survey No. 28/1 & 28/2, Nagarur Village, Huskur Road, Dasanapura Hobli, Bengaluru North Taluk – 562 123 is as below from Jan-2023 to Dec-2024:

Position in the Committee	Name of the Committee Members	Contact Details
Chairperson	Mrs. Shyla C.	Mobile: 96630 44936 Email: shyla.c@biesse.com
Subject Expert External	Mrs. Karuna S G.	Mobile: 97430 17224 Email: karuna.ccs@gmail.com
Member 1	Mr. Raghavendra UL	Mobile: 99021 44990 Email: raghavendra.ul@biesse.com
Member 2	Ms. Jyothi M	Landline: 080-49489714 Email: jyoti.mulimani@biesse.com

- d) A quorum of four members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two members, one of whom shall be a lady
- e) The Complaints Redressal Committee is responsible for:
- Investigating every formal written complaint of sexual harassment.
 - Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
 - Discouraging and preventing employment-related sexual harassment.

8. Procedures for resolution, settlement, or prosecution of acts of sexual harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as follows:

8.1. Informal Resolution Options:

- a) When an incident of sexual harassment occurs, the victim of such conduct can immediately communicate her disapproval and objections to the harasser and request the harasser to behave decently.

- b) If the victim is uncomfortable addressing the harasser directly, she can approach a first-instance person (e.g., a department senior or other responsible person or HR) who will be the first point of contact for anyone seeking informal support/intervention to stop unwelcome behavior.
- c) If the harassment does not stop or the victim is uncomfortable addressing the harasser directly or with a first instance person, she can bring her concern to the Internal Committee's attention to redress her grievances. The Internal Committee will then provide advice or extend support as requested and undertake a prompt investigation to resolve the matter.
- d) The benefits of an informal process are as follows:
 - i It is consistent with the preventive approach.
 - ii It helps to diffuse a situation without diluting the problem.
 - iii Often people just want unwelcome behavior to stop without explicit penalization; an informal process makes this option available.
 - iv It enrolls employees in an effort to eliminate unwelcome behavior at work.
 - v It makes the Redressal Committees a point of last resort.

8.2. Complaint to the Internal Committee:

- a) Any 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 Chairperson of the Internal Committee constituted by the Management. The complaint shall be in writing, preferably in the form of a letter, and sent in a sealed envelope within ten days from the date of the alleged incident. Alternatively, the employee can send a complaint through e-mail. The employee must disclose her name, department, division, and location where she is working to enable the Chairperson to contact her and take the matter forward.
- b) The Chairperson of the Internal Committee 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 the receipt of the complaint. If the allegation does not fall under the purview of Sexual Harassment or does not constitute an offense of Sexual Harassment, the Chairperson will record this finding with reasons and communicate the same to the complainant.
- c) If the Chairperson of the Internal Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Internal Committee.
- d) Where such conduct on the part of the accused amounts to a specific offense under the law, the Company shall initiate appropriate action in accordance with the law by making a complaint with the appropriate authority.
- e) The Internal Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the employer as soon as practically possible and, in any case, not later than 90 days from the date of receipt of the complaint. The employer will ensure corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.

- f) Corrective action may include any of the following: i. Formal apology ii. Counseling iii. Written warning to the perpetrator with a copy maintained in the employee's file iv. Change of work assignment or transfer for either the perpetrator or the victim v. Suspension or termination of services of the employee found guilty of the offense g) In case the complaint is found to be false, the Complainant shall, if deemed appropriate, be liable for appropriate disciplinary action by the Management.

8.3. Redressal Process

- a) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident in writing with her signature to any member of the Committee within 10 days of the occurrence of the incident.
- b) The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential if it is so desired, except to use the same for discreet investigation.
- c) The Committee will hold a meeting with the Complainant within five days of receiving the complaint but no later than a week in any case.
- d) At the first meeting, the Committee members shall listen to the Complainant and record her allegations. The Complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate her complaint. If the Complainant does not wish to depose personally due to the embarrassment of narration of events, a lady officer shall meet and record the statement.
- e) Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee, and an opportunity will be given to him to give an explanation. The Committee will then conduct an "Enquiry" and conclude it.
- f) If the complaint does not fall under the purview of Sexual Harassment or does not constitute an offense of Sexual Harassment, the same will be dropped after recording the reasons.
- g) In case the complaint is found to be false, the Complainant shall, if deemed appropriate, be liable for appropriate disciplinary action by the Management.

8.4. Enquiry Process:

- a) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the person against whom the complaint is made.
- b) The Committee shall prepare and hand over the Statement of Allegation to the person against whom the complaint is made and give him an opportunity to submit a written explanation if he so desires within seven days of receipt of the same.
- c) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.
- d) If the Complainant or the person against whom the complaint is made desires any witnesses to be called, they shall communicate in writing to the Committee the names of witnesses whom they propose to call.
- e) If the Complainant desires to tender any documents as evidence before the Committee, she shall supply original copies of such documents. Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the Committee, he shall supply original copies of such documents. Both shall affix their signatures on the respective documents to certify them as original copies.

- f) The Committee shall call upon all witnesses mentioned by both parties.
- g) The Committee shall provide every reasonable opportunity to the Complainant and the person against whom the complaint is made for putting forward and defending their respective cases.
- h) The Committee shall complete the "Enquiry" within a reasonable period but not beyond three months and communicate its findings and recommendations for action to the Employer. The report of the Committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- i) The Employer will direct the appropriate action in accordance with the recommendations proposed by the Committee.
- j) The Committee shall be governed by rules framed by the Supreme Court orders or any other legislation enacted later on.

8.5. Guidelines for members of the Internal Committee:

- a) Believe in the reality of the complaint lodged.
- b) Empathize with the complainant.
- c) Do not function like a criminal court.
- d) Remember that it may be difficult for an employee to talk about anything 'sexual.' Hence there can be a long time interval between the harassment and the actual complaint.
- e) Handle complaints in a confidential manner and within a time-bound framework (should not, in any case, exceed 30 working days).
- f) Ensure safety for the complainant and her/his supporters if such a need be felt.
- g) The Committee can recommend actions against persons engaging in intimidation of the complainant or witnesses to a complaint.
- h) Discard pre-determined notions of how an accused should look or behave. i) Beware of stereotypes.
- i) Do not insist on a detailed description of harassment. This could increase the complainant's trauma.
- j) Most sexual crimes are committed in private; hence witnesses should not be insisted upon.
- k) Make discreet inquiries as to whether other employees have experienced similar problems.
- l) Document the results of any sexual harassment complaint or investigation. The results also document any corrective action that the employee or supervisor was asked to take.
- m) Create awareness regarding the policy and the redressal mechanism for any complaints about Sexual Harassment.

8.6. Other points to be considered

- a) The Committee may recommend to the employer action that may include transfer or any other appropriate disciplinary action.
- b) The management shall provide all necessary assistance to ensure this policy's full, effective, and speedy implementation.
- c) Where sexual harassment occurs due to an act or omission by any third party or outsider, the Company shall take all necessary and reasonable steps to assist the affected person in support

and preventive action.

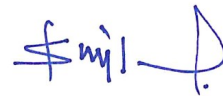
- d) The Committee shall analyze and put up a report on all complaints of this nature at the end of the year for submission to the Employer.
- e) In case the Committee finds the degree of offense coverable under the Indian Penal Code, then this fact shall be mentioned in its report, and appropriate action shall be initiated by the Management, including making a Police Complaint.

Prepared By



GM – HR & ER

Approved By



CEO