

Anti Sexual Harassment Policy

Preface

We, at Bangalore Fort Farms Ltd., follow the philosophy of respecting the dignity of all individuals. Furthermore, we strive to foster a work environment that is conducive to the professional growth of our women employees and encourages equality of opportunity. Sexual harassment at work is an affront to, and seriously undermines the dignity of the victim and, thus, has the potential of polluting the work environment. Such conduct is, therefore, wholly incompatible and irreconcilable with the policy of the Company to provide a work environment free of harassment, discrimination, intimidation and insult. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

Objective

The main objective of creating this Policy Document is to establish a complaint redressal mechanism and procedure to effectively combat incidents of sexual harassment at work place and to ensure resolution of complaints against such conduct in a fair and timely manner.

Applicability

This policy is applicable to all complaints of sexual harassment at work made against women employees of Bangalore Fort Farms Ltd. and its subsidiary companies.

This policy applies to all categories of women employees of the Company, including permanent engagement, workmen, temporary, contractual and trainees at its workplace or at client sites.

The Company will also not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

This Policy extends to all employees of the Company and is deemed to be incorporated in the terms and conditions of service of all employees and comes into effect immediately.

Statement of Principles

- The Policy bestows the responsibility and obligation on the Management and also on every employee to contribute in maintaining a non-hostile and a pleasant working environment. All employees should respect the dignity and personality of other employees.
- The policy recognizes the right of complaint of every employee who has suffered sexual harassment. It is in the self interest of the complainant to make the complaint promptly.
- The policy seeks to encourage employees to express freely, responsibly and in an orderly manner opinions and feelings about any problem or complaint of sexual harassment. Retaliation against any employee who report or provide information about sexual harassment or behavior that might constitute sexual harassment is strictly prohibited. Any act of reprisal, including internal interface, coercion and restraint by an employee or one acting on his/her behalf violates this policy and will result in appropriate disciplinary action. The Policy envisages appropriate disciplinary action against any employee who indulges himself/herself or abets the activities of sexual harassment or the acts of victimization or retaliation against complainant or employee involved in the process of redressal of complaints of sexual harassment in whatsoever manner.

- Any employee who engages in conduct amounting to be harassment, or who encourages such conduct by others, or who indulges in victimisation of or retaliation against the complainant or the complainant's witnesses or the complainant's confidential counselor or any other employee who supported or supports them shall become liable for corrective action including appropriate disciplinary action, which may even include termination from service.
- The policy recognizes the right of privacy of every individual and will strive to protect the privacy of the individuals involved and ensure that the complainant and the offender are treated fairly. Information about individual complaints and their disposition is considered confidential and will be shared only on need to know basis.
- The Policy ensures that the career interest of both the parties will not be adversely affected merely on account of the complaint made to the Redressal Committee.
- This Policy however shall not be used to bring frivolous or malicious complaint against any employee. If a complaint is made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action may be taken against the person bringing the complaint.

Definition

The Sexual Harassment of Women At Workplace (Prevention, Prohibition and Redressal) Act, 2013 defines the act of "Sexual Harassment" as that which includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- (a) physical contact and advances; or
- (b) a demand or request for sexual favours; or
- (c) sexually-coloured remarks; or
- (d) showing pornography; or
- (e) any other unwelcome physical, verbal or non-verbal conduct of indecent nature.

Moreover, Section 3(2) of the said Act also states that the following circumstances, if it occurs or is present in relation to or connected with any act of behaviour of sexual harassment may amount to sexual harassment –

- i) Implied or explicit promise of preferential treatment in her employment;
- ii) Implied or explicit threat of detrimental treatment in her employment;
- iii) Implied or explicit threat about her present or future employment status;
- iv) Interference with her work or creating an intimidating, offensive or hostile work environment for her, or
- v) Humiliating treatment likely to affect her health or safety.

Misconduct

Bangalore Fort Farms Ltd. shall treat commission of an act amounting to sexual harassment by an employee as a disciplinary offence. Victimising or retaliating against an employee for bringing a complaint of sexual harassment in good faith, as well as making registering complaints with malicious intentions shall also be treated as a disciplinary offence

Complaint Procedure

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Internal Complaints Committees" have been created in the Company for time-bound redressal of the complaint made by the victim. These committees have been formed in accordance with the provisions of The Sexual Harassment of Women At Workplace (Prevention, Prohibition and Redressal) Act, 2013. They will prevail at Apex, Regional and Factory level to ensure effective deployment and implementation of the policy provisions on a pan- India basis within the stipulated time frame.

Procedure to deal with complaints

i) An aggrieved woman may make a complaint of sexual harassment at workplace in writing to the Internal Committee within a period of three months of the incident. In case of a series of incidents the complaint has to be within a period of three months from the date of the last such incident. The Internal Committee may extend the time limit by a maximum of another three months if it is satisfied that the complainant had valid reasons for such delay in making the complaint.

ii) The Internal Committee may, at the request of the complainant, take steps to settle the matter through conciliation between the parties. However, no monetary settlement is permissible based on the conciliation.

Copies of the settlement arrived at shall be furnished to both the parties.

The fact of the settlement shall be recorded by the Internal Committee and forwarded to the Director – HR & Personnel of the Company for necessary action.

iii) In case no settlement can be arrived at or the complainant has not opted for conciliation, the Internal Committee shall conduct an enquiry into the complaint. The Internal Committee may constitute a sub-committee from amongst its members or nominate any individual member to conduct such investigation.

The investigation should ordinarily be completed within 30 days of the receipt of the written complaint by the Internal Committee.

The parties shall be given an opportunity of being heard and may be assisted or represented by any employee representative of their choice during the enquiry. A copy of the finding shall be given to both parties to enable them to make representations against the findings of the Internal Committee

The enquiry proceedings shall be completed within a period of 90 days.

iv) For the purpose of conducting the enquiry the Internal Committee shall have the powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:-

- a) summoning and enforcing the attendance of any person and examining him on oath;
- b) requiring the discovery and production of documents; and
- c) any other matter which may be prescribed.

v) On completion of the enquiry the Internal Committee shall provide a Report of its finding to the Director – HR & Personnel within a period of 10 days from completion of the enquiry. A copy of the Report shall also be given to the concerned parties.

If the Internal Committee arrives at a finding that the allegation has not been proved, it shall recommend to Director - HR & Personnel that no action requires to be taken in respect of the complaint.

If the Internal Committee arrives at a finding that the allegation has been proved, it shall recommend to Director - HR & Personnel -

-|| To take action for sexual harassment as misconduct in accordance with the service rules applicable to the respondent.

-|| To deduct, notwithstanding anything in the service rule applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the complainant.

In case such amount cannot be deducted from the salary due to his absence or cessation of employment it may direct the respondent to pay such amount to the complainant. In case the respondent fails to pay such amount the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or has been made knowing it to be false or any forged or misleading documents has been produced, it may recommend to the Director – HR & Personnel to take action against the complainant in accordance with the service rules applicable to her. Provided further that the malicious intent on the part of the complainant shall be established after an enquiry before any action is recommended.

Where the Internal Committee arrives at a conclusion that any witness has given false evidence or produced any forged or misleading documents it may recommend to the Director – HR & Personnel to take action against such witness in accordance with the provisions of the service rules applicable to such witness.

Confidentiality

Bangalore Fort Farms recognises that recounting the experience of sexual harassment is traumatic and can damage the complainant's dignity. Therefore, a complainant should not be required repeatedly to recount the events complained of where this is not necessary.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

While it is important to maintain full confidentiality throughout the investigation/enquiry, the alleged offender would be provided with all relevant details of the complaint made against him or her and a reasonable opportunity to respond and defend.

Escalation

Any enquiry into a misconduct will be escalated under the following circumstances:

- i. When the Regional / Factory level committee is unable to reach a valid conclusion, and ambiguity of decision remains;
- ii. When either of the party involved has reason to believe the investigation and resulting decision has not been a thorough and objective one, and is not satisfied with the same;

Criminal Proceedings

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

The decision of the Apex Committee is final in case of any misconduct and enquiry under this head.

„Third-party Harassment“

Bangalore Fort Farms also stands committed to take appropriate preventive and remedial action to prevent sexual harassment of its employees by non-employees. Where sexual harassment occurs as a result of an act by any third party or outsider, the Management would take all steps necessary and reasonable to assist the victim in terms of support and preventive action. Should any employee face sexually harassing behaviour at work from a third party, such as a client or customer of Bangalore Fort Farms Ltd. and its subsidiaries, the Management would take appropriate corrective or remedial action. However, it would be necessary for the complainant/recipient to promptly report such harassment to the Management or the designated officers so as to enable the Management to take appropriate action. Unless the employee reports the harassment to the Management, the latter in no case shall be responsible or liable in this regard.

Reviewing the Policy

Bangalore Fort Farms Management would periodically monitor, review and evaluate the working and efficacy of this policy. This Policy shall be governed by and construed in accordance with the laws of India.

