



BRAND CONCEPTS LIMITED

Policy of the Company under the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013

1.0 Objective

Brand Concepts Limited ('the Company' or 'BCL') is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

At BCL, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

BCL strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being the The Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment.

2.0 Scope

This Policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace. The Policy is gender neutral and shall apply to both males and females.

The workplace includes:

- All offices, all plants or other premises where the Company's business is conducted.
- All Company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- This Policy also covers any outsiders, including vendors, consultants, customers, or visitors, who are present at the office, factory, stores, warehouse, or any other place where the Company carries on its business.

3.0

Definition of sexual harassment

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- c) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- e) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined in (a) above, may amount to sexual harassment: —
 - (i) Implied or explicit promise of preferential treatment at work; or
 - (ii) Implied or explicit threat of detrimental treatment at work; or
 - (iii) Implied or explicit threat about present or future employment status; or
 - (iv) Interference with work or creation of an intimidating or offensive work environment; or
 - (v) Humiliating treatment likely to affect health, safety or self-esteem.

4.0

Policy statement

All employees, at all levels of Brand Concepts Limited:

- a) will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) will understand and appreciate the rights of the individual to be treated with dignity.
- c) are required to maintain a work environment, which is free from any kind of harassment.
- d) will refrain from committing any acts of sexual harassment at work place.

Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.

BCL employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

5.0

Procedure for dealing with complaints of sexual harassment

- a) If the person believes that she has been subjected to sexual harassment, then the complaint / grievance should be promptly reported to the Internal Complaints Committee (ICC) through the respective HR Manager or the Unit / Location / Department Head.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period of 1 (one) month from the date of incident / last incident.
- c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- d) An "Internal Complaint Committee" will be set up to deal with the complaint. A female BCL employee will head the Committee and not less than half of its members will be women. Further, to prevent any undue influence, the Committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.
- e) The Complaint Committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- f) Any victimization of, or retaliation against, the complainant or any other employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action.
- g) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.

6.0

Disciplinary Action

Sexual harassment will not be tolerated at BCL. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behavior has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

7.0

Internal Complaint Committee (ICC)

The Committee will be chaired by a senior female employee. In addition, the members would include one senior HR person, female managers and an external executive from any NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment. The Committee shall be formulated in a manner so as to safeguard both genders. Members shall be persons who are committed to the cause of

women or who have experience in social work or have legal knowledge. The members of the committee will be rotated every 3 years.

The Internal Complaint Committee may constitute sub-committees for places where factories and other offices are located. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

8.0

Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by BCL shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

9.0

Members of Internal Complaint Committee (ICC)

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

Sr. No.	Name	Designation / Department
1	Ms. Swati Gupta	Head – Legal & Company Secretary – Presiding Officer
2	Ms. Ankita Sharma	Vice President – Human Resource / Member
3	Nabendu Chakraborty	Chief Operating Officer / Member
4	Mr. Kalyan Maheshwari	Vice President – Accounts & Finance / Member

Third Party / Representative:

Sr. No.	Name	Designation / Department
1	Dr. Sudha Jain	Asst. Professor – Indore School of Social Work / External Member

Ms. Swati Gupta shall act as Presiding Officer of the Committee.

The ICC shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

10.0

Applicability

The Policy shall become operational from the date as may be decided by the Board of Directors of the Company.

The Policy shall be circulated to all employees at Registered Office, Factories and such other places where company carry own its Business

The Policy shall also be displayed at appropriate places or notice boards to bring it to notice of all.

The Policy shall also be translated into Hindi language and circulated further for comfort employees and workers.

The Company / Committee shall also organize workshops and awareness programmes relating to above Policy, as and when required.