

Authorized by – Head – HR

1. OBJECTIVE

Bilt Ballarpur Industries Ltd ('Company') comprising of its divisions of Premier Tissues India Ltd.; APR Sacks; Bilt Kamlapuram unit; Bilt Shreegopal unit, is committed to providing a healthy working environment to all its employees enabling them to work without fear of prejudice, gender bias and sexual harassment. In line with the same, the company has laid down a policy statement:

- a) Defining the acts of sexual harassment,
- b) The procedures for curbing such tendencies
- c) To ensure that no employee is subjected to Sexual Harassment, intimidation or exploitation at the workplace
- d) To address issues related to Sexual Harassment promptly, confidentially and sensitively
- e) To provide for punishment and prosecution of wrong doers

The policy forms an integral part of the service conditions of all the employees, trainees & retainers and is in accordance with the applicable laws. The objective of the policy is to educate employees on what conduct constitutes sexual harassment, the ways and means to prevent occurrence of such conduct and the redressal mechanism in event of its occurrence.

2. SCOPE

- 2.1. This policy applies to all the employees (full time / temporary / part time), trainees, retainers, whether in the office premises or outside while on assignment or work related events of company.
- 2.2. In event of occurrence of any instance of sexual harassment with respect to a company employee as a result of an act by a third party or an outsider arising out of and during the course of employment, the company will take necessary and reasonable steps to assist such effected employee in terms of support and preventive actions.

3. DEFINITION OF SEXUAL HARASSMENT

- 3.1. The term 'Sexual Harassment' is defined to include any one or more of the following unwelcome conduct, acts or behavior, whether physical, verbal, textual, graphic, electronic or by any other action, whether directly or by implication, namely:
 - a) Physical conduct or advances
 - b) A demand or request for sexual favors
 - c) Sexually coloured remarks
 - d) Showing pornography

Where

- a) Submission of such conduct is made either explicitly or implicitly a term or condition of employment
 - b) Submission or rejection of such conduct by an employee is used as the basis for employment decisions affecting such employee
 - c) Such conduct unreasonably interferes with an employee's performance and discharge of official duties or create an intimidating, hostile or offensive working environment
 - d) Such conduct is likely to affect an employee's health and safety
- 3.2. Without prejudice to the generality of the forgoing 'Sexual Harassment' will include inappropriate conduct such as comments, jokes or degrading language which is sexual in nature or sexually

suggestive objects, books, magazines, photographs, cartoons, pictures, calendars, posters, electronic communication or other materials.

4. CONSTITUTION OF SEXUAL HARASSMENT COMPLAINT COMMITTEE

4.1. The company has constituted a Sexual Harassment Complaints Committee ('Committee') which is headed by a senior women official and not less than half of the total members of the committee comprise of women. Company has also appointed two members with socio/legal knowledge and a representative of an NGO on the Committee so as to ensure transparent and impartial process of redressal of sexual harassment complaints.

4.2. Currently the Committee comprises of the following members:

S. No.	Name	Designation Department/Location	Contact details
1	Mr. M K Gupta	Unit Manager Shreegopal	m.gupta@bilt.com
2	Ms. Monica N Mehta	Manager Legal - FIP	monica.mehta@bilt.com
3	Ms. Shalini Sehgal	Executive Secretary Corporate Secretarial-FIP	shalini.sehgal@bilt.com
4	Ms. Nalinakshi	Asst Manager - HR PTIL - Bangalore	nalina@premiertissues.com
5	Mr. Amlan Pradhan	Business Head APR Sacks Ashti	amlan.pradhan@avanthaholdings.com
6	Mr. Y Kesava Reddy	Dy General Manager HR - Kamlapuram Unit	y.kesavareddy@bilt.com
7	Mr. S Bhattacharjee	Dy General Manager Corp H R - FIP	s.bhattacharjee@bilt.com
8	Ms. Rohini Mukherjee	Chief Policy Officer Naandi Foundation-Delhi	Rohini@naandi.org

4.3. Changes in the constitution of the committee whenever necessary shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by a member.

5. FUNCTIONS AND DUTIES OF THE COMMITTEE

5.1. Redressal of complaints relating to sexual harassment in a fair and expeditious manner

5.2. Initial evaluation of complaint for ascertaining the necessity for an investigation and disciplinary proceeding

5.3. Take appropriate action based on investigation findings

5.4. Recommend appropriate psychological, emotional and material support (counseling, security or other assistance) to the victim

5.5. Take appropriate action for false complaints

5.6. Ensure strict confidentiality of the redressal proceedings

5.7. Ensure protection of the victim against victimization or retaliation and recommend appropriate action in case of occurrence thereof

5.8. Document minutes of meetings and discussions held by the committee with the victim/complainant, accused, witness etc. during the course of redressal proceedings

- 5.9. Recommend filing of criminal complaint where necessary in the event of sexual harassment is established and it amounts to a specific offence under criminal laws
- 5.10. Preparation of an annual report at the end of the year giving a complete account of its activities and submission of such reports to the appropriate government department as may be required under law

6. ROLES AND RESPONSIBILITIES

6.1. Employees

- a) Update themselves on the policy
- b) Comply with company's code of conduct and not indulge in any act which amounts to sexual harassment
- c) Promptly report incidents of sexual harassment which should not be anonymous for effective redressal of the complaint
- d) Ensure a conducive working environment
- e) Co-operate in any investigation

6.2. Heads of Departments and Managers

- a) Ensure there is no hostile environment in the workplace
- b) Immediately report any complaint or grievance on sexual harassment to the committee
- c) Ensure protection from victimization/retaliation against the person making a complaint of sexual harassment
- d) Co-operate in any investigation

6.3. HR Department

- a) Spread awareness with respect to this policy
- b) Ensure that new employees are made aware of this policy at the time of induction
- c) Provide sufficient security within the office premises
- d) Clarify to employees on queries in relation to this policy wherever required
- e) Maintain records of all sexual harassment cases and findings
- f) Assist in redressal mechanism and ensure speedy disposal of the complaint

7. REDRESSAL MECHANISM

- 7.1. Any employee who (i) has a reason to believe that he or she is being subjected to sexual harassment (**'Victim'**) or (ii) Observes or receives a complaint regarding sexual harassment, should promptly report it to the following (Victim or the person making the complaint hereinafter referred to as **'Complainant'**)
- a) Immediate Reporting Manager (**'Supervisor'**)
 - b) Head of Department (**'HoD'**)
 - c) Human Resource Representative (**'HR Rep'**)
 - d) Any member of the committee (**'Committee Member'**)
- 7.2. Where the complaint is made verbally, the person to whom the complaint is made shall reduce the verbal complaint to writing in presence of the victim / complainant and the victim / complainant shall peruse same and shall for the purpose of authentication of the record, sign the recorded complaint
- 7.3. Where the complaint is made to the Supervisor, HoD, or HR Rep, such person shall promptly forward the complaint by the way of an email the committee, providing all details of the complaint including the name of the alleged accused. The victim / complainant shall be marked on all such emails. The email should also include contact details of victim / complainant and the department

in which the victim / complainant works

- 7.4. Upon receipt of complaint the committee shall make a *prima facie* evaluation of the complaint to determine whether or not it warrants an investigation. For the purpose of such an evaluation, the committee shall be entitled to seek assistance from experts within or outside the company as it may deem fit and appropriate, to hold preliminary discussions with the victim / complainant and the accused or any other relevant person and call for documentary evidence if any
- 7.5. If the committee concludes that the complaint does not warrant investigation or enquiry, the committee shall authorize any one committee member to formally close this complaint and inform the victim / complainant of the decision in writing by the way of a closure letter. Irrespective of whether or not an investigation is conducted, the victim / complainant and the accused will be provided with an opportunity to represent their position and provide their explanation to the committee prior to the closure of the complaint.
- 7.6. If the committee concludes that the complaint warrants investigation or enquiry, the committee shall undertake the following actions:
 - a) Depending upon the nature of complaint, the company shall appoint an investigating officer of either gender to conduct an investigation into the allegations made in the complaint. The manner of conducting the investigation will be as follows:
 - i. The investigation officer shall prepare a charge sheet setting out the nature of charges and send such charge sheet to the accused
 - ii. The investigating officer shall undertake the investigation of the complaint by interviewing the relevant persons and inspecting necessary documents and records
 - iii. The accused shall be given fair and reasonable opportunity to present his or her case, to call for his or her own evidence, to inspect the documents and records produced as evidence and to cross examine the witnesses
 - b) On conclusion of the investigation, the investigating officer shall submit a written investigation report to the committee
 - c) Findings of the investigation shall be communicated to the accused to enable him / her to provide his / her response to the findings of the investigation
 - d) If the investigation report does not establish occurrence of sexual harassment, the committee through its member authorized on its behalf will file a complaint closure note and shall send a written closure letter informing the victim / complainant and the accused on the outcomes of the investigation and formally close the file
 - e) If the investigation report establishes that the complainant had deliberately filed a false complaint or was based on false grounds and is malicious, it may recommend to the CEO to take appropriate action against the complainant. The CEO will direct action in accordance with the recommendations proposed by the committee within 30 days of its receipt by him
 - f) If the investigation report establishes sexual harassment, the committee will after providing a hearing to the accused and looking into the fresh evidence (if any), send the recommendation to take appropriate action to the CEO within 10 days of completion of the inquiry.
 - g) The CEO based on the gravity of the allegations in the complaint and the extent to which the guilt of the accused is established; take corrective action based on the recommendations of the committee. The corrective actions may include:

- i. Formal apology
- ii. Counseling
- iii. Written warning
- iv. Reduction in Rank/ demotion
- v. Stoppage of increment
- vi. Transfer of service / change of assignment
- vii. Dismissal from services
- viii. Any other action as suggested by the Committee

- h) For the purpose of hearing, a minimum three member committee shall be required to be present of which presence of the representative from an NGO shall be mandatory. The aforesaid action shall be communicated by the committee through its member authorized on its behalf by way of a letter addressed to the victim / complainant and the accused providing reasons for decision of the committee

7.7. Entire redressal mechanism shall be completed within 60 working days from the date of receipt of complaint by the Supervisor, HoD, HR Rep or the Committee. The decision of the CEO in this regard shall be final

7.8. The committee shall also file a criminal complaint if required under the law, based on the incident, investigation and all relevant circumstances

8. VICTIMIZATION / RETALIATION

8.1. The company prohibits retaliatory actions against anyone, who in good faith, rises concerns or questions against the ethics, discrimination or harassment matters, or report suspected violations of other applicable laws, regulations or policies.

8.2. The supervisor, HoD or the HR Reps must be vigilant towards any possible retaliatory actions. The Victim / Complainant should communicate any retaliatory action to the supervisor, HoD or the HR Reps or directly to the committee. Where the complainant has not communicated such actions directly to the committee, the supervisor, HoD or the HR Reps shall immediately communicate any complaint of retaliatory actions received by it to the committee.

8.3. Where the retaliatory action is established, the committee may recommend transfer of the alleged accused or victim / complainant to avoid any further act of victimization. The committee may also recommend appropriate disciplinary actions against such retaliatory actions

9. CONFIDENTIALITY

9.1. The company is committed to handle matters regarding sexual harassment with sensitivity and shall maintain confidentiality throughout the redressal process

10. ENFORCEMENT AND AMENDMENT

10.1. This policy shall come into force with immediate effect

10.2. Any amendments to the policy shall be suitably communicated to the employees.