



BHAGAWATI GAS LIMITED

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NEW DELHI- 110048, INDIA

CIN - U24111RJ1974PLC005789

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I.COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Company recognizes that the Law has been passed as a measure to provide equal opportunity to work to its women population and grant them equality under the Constitution of India. Thus, the procedure and the mechanism specified in Law has been provided keeping the women population in mind i.e. to prevent instances of sexual harassment of women at workplace and to have a complaints mechanism to address their complaints.

Company has therefore formulated this policy against sexual harassment at workplace ("Policy")

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will 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.

REGD. OFFICE & WORKS:

Banawas, P. O. Khetrinagar-333504

Dist. Jhunjhunu (Rajasthan)

BALLABGARH UNIT:

Plot No. 5, Sector - 25

Ballabgarh - 121004

III OBJECTIVE:

To ensure a safe work environment for all employees by setting guidelines and processes for prevention, prohibition and redressal of sexual harassment.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical),
2. Demand or request for sexual favours,
3. Any other type of sexually-oriented conduct,
4. Verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. INTERNAL COMMITTEE :

The Company has constituted an internal committee to accept and dispose of

complaints of Sexual Harassment for the purposes of this Policy (the “Internal Committee”). The Internal Committee consists, as of now, of 4 members; however in no circumstance shall the membership of the Internal Committee fall below 4 (four). At least half the members of the Internal Committee shall be women at all times. The Internal Committee shall comprise the following members:

- a) a presiding officer who shall be a senior woman Employee of the Company;
- b) 2 member Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c) a member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment (collectively the “Members”).
- d) Details of the current Members of the Internal Committee are contained below:

Name	Designation	Email	Role In The Internal Committee
Mrs. Shachi Bhardwaj	Director	bhagwatigases@gmail.com	Presiding Officer
Ms. Nidhi Babbar	Company Secretary	1991.nidhi01@gmail.com	Member
Ms. Padmja Bhardwaj	Employee	bhagwatigases@gmail.com	Member

Each Member of the Internal Committee shall hold office for a term of 2 years from the date of appointment of such Member. However, the Company may temporarily extend the Term of any member of the Internal Committee in order to dispose of any pending complaints of Sexual Harassment.

The Company may remove a Member of the Internal Committee and such Member shall thereby cease to hold office as a Member of the Internal Committee if such Member is found to have been involved in any action or situation that is immoral and unbecoming of an Employee of the Company.

VII. REPORTING A COMPLAINT

Any aggrieved woman who believes or apprehends that an act of Sexual Harassment has been committed against her, in violation of this Policy, may make a complaint in writing or by email along with supporting documents, list of names and addresses of witnesses, etc. to the Internal Committee or any Member thereof at the earliest and in any case within 3 (three) months from the date of the incident of

alleged Sexual Harassment and in case of a series of such incidents, within a period of 3 (three) months from the date of the last incident (the “Complaint”). However, the Internal Committee may extend the time limit for making a Complaint by recording reasons in writing if it is satisfied that legitimate circumstances existed which prevented the aggrieved woman from making a Complaint within the prescribed period.

If any aggrieved woman is unable to make a Complaint on account of physical incapacity a complaint can be filed by :

- relative or friend
- co-worker
- an officer of the National or State Commission for Women,
- any person who has knowledge of the incident with the written consent of the aggrieved woman

Where the aggrieved woman is unable to make a Complaint on account of physical incapacity, the following persons may file a Complaint on behalf of the aggrieved woman:

- relative or friend
- a special educator
- a qualified psychiatrist or psychologist,
- the guardian or authority under whose care she is receiving treatment
- or any person who has knowledge of the incident jointly with any of the other persons referred to in this paragraph

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 under:

A. Informal Resolution Options

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

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An 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 Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Complaints 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 receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

3. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

4. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head-P&A as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head-P&A will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

a. Formal apology

b. Counselling

c. Written warning to the perpetrator and a copy of it maintained in the employee's file

d. Change of work assignment / transfer for either the perpetrator or the victim.

- e. Suspension or termination of services of the employee found guilty of the offence

VIII. MALICIOUS COMPLAINTS OR FALSE EVIDENCE

The Company views Complaints of Sexual Harassment as gross misconduct and a serious violation of this Policy entailing strict punishment. A Complaint alleging Sexual Harassment should not be submitted to the Internal Committee or any Member thereof unless an act of Sexual Harassment has actually taken place.

If the Internal Committee or sub-committee thereof arrives at a conclusion that the allegation against the accused is malicious or that the aggrieved woman has made the Complaint knowing it to be false or that she has produced any forged or misleading document, it shall make a recommendation to the Human Resource Department to take action against the aggrieved woman in the manner set out in this Policy. Prior to making such a recommendation, the malicious intent on part of the aggrieved woman shall be established through an inquiry. However, the mere inability to substantiate a complaint or provide adequate proof will not attract action against the aggrieved woman.

The Internal Committee or sub-committee thereof may make a recommendation to the Human Resource Department to take action in accordance with this Policy against any witness in an inquiry if it arrives at a conclusion that during the inquiry, said witness has given false evidence or produced any forged or misleading document.

IX. PUNISHMENT FOR SEXUAL HARASSMENT, MALICIOUS COMPLAINTS AND FALSE EVIDENCE

If the Internal Committee or sub-committee thereof arrives at the conclusion that the allegation against the accused has been proved, any or all of the following actions may be taken by the Human Resource Department against the accused:

- a) requiring the accused to submit a written apology to the aggrieved woman;
- b) giving the accused a strict warning, reprimand or censure;
- c) requiring the accused to attend counselling sessions;
- d) requiring the accused to carry out community service;
- e) withholding the promotion of the accused;
- f) withholding of pay rise or increments of the accused; and g) termination of employment of accused.

X. PROTECTION AGAINST RETALIATION

There will be no retaliation against an employee who, in good faith, files a complaint or participates in any way in the investigation of a complaint. The organization will not allow retaliation against that person. Individuals engaging in retaliatory conduct will be subject to disciplinary action, which may include termination and if necessary legal action and/or a police complaint. If you suspect that you or someone you know has been retaliated against for raising an issue, immediately contact the Human Resources Department or Regional or National SHPC.

XI. CONFIDENTIALITY:

All discussions / decisions pertaining to an incident of sexual harassment must be kept confidential. Therefore, contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Appropriate information will be shared with Government authorities as per the Act. If any person (including Complainant, witnesses) breaches confidentiality, Company may take any other action as it may deem fit

XII. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XIII. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XIV. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Approved By or on behalf of Board of Director of
BHAGAWATI GAS LIMITED

Sd/
RAKESH SAMRAT BHARDWAJ
MANAGING DIRECTOR AND CHAIRMAN
DIN: 00029757

Effective Date: 22.07.2025

Date of the approval by the Board: 22.07.2025