



BULLS EYE KNOWLEDGE SYSTEM LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORK PLACE

[Pursuant to Section 4 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act)]

The Policy on Prevention of Sexual Harassment at Work Place is a statutory requirement and is guided by Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) (SHWW) Act, 2013.

▪ **OBJECTIVE**

The objective of this policy is to prohibit and provide protection against sexual harassment to any employee, suppliers, consultants, trainees, students etc.

▪ **APPLICABILITY**

This policy is applicable to all employees who are on rolls or on contract, trainees, interns, consultants, students etc. The policy covers harassment of women by men or men by women. This is a zero tolerance policy irrespective of who is involved.

▪ **ACRONYMS**

ICC: Internal Complaints Committee

MD: Managing Director

▪ **DEFINITIONS**

Complainant: Aggrieved person

Respondent: Against whom the Complaint is given

Employee: Individuals either on permanent rolls of Bulls Eye Knowledge System Limited or on contract

▪ **CONSTITUTION OF THE INTERNAL COMPLAINTS COMMITTEE (ICC)**

The Internal Complaints Committee consists of following members as nominated by the Managing Director:

S. No	Name	Designation
1	Ms. Preeti Kapoor	Presiding Officer
2	Ms. Navroop Dhillon	Member cum Secretary
3	Ms. Jyotpreet Kaur	Member
4	Ms. Rachna Gautam	Member
5	Ms. Prerna Kalra	External Member

▪ **FEATURES**

I. All employees in the organization must be aware of the following:

a) Sexual Harassment:

It includes any one or more of the following unwelcome acts or behavior (whether directly or indirectly, namely:

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks; or
- Showing pornography or offensive pictures or written materials; or
- Verbal – unpleasant or suggestive remarks, personal comments, jokes causing embarrassment, innuendos and taunts, sexist remarks (gender based insults)

- and offensive telephone calls/messages
- Implied or explicit promise of preferential or detrimental treatment in his/her employment; or
- Implied or explicit threat about his/her present or future employment status; or
- Humiliating treatment likely to affect his/her health or safety
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

b) Workplace includes:

- Within the premises of the office/sites/laboratories/greenhouses
- Any place visited by the employee whether on roll or on contract, trainees, interns arising out of or during the course of the employment
- Transportation provided by the Foundation or during travel whether in own vehicle or of others or hired
- Guest house/hotel where an employee whether on rolls or on contract, trainees and interns is staying while on duty

II. Internal Complaints Committee: The Internal Complaints Committee (ICC) is constituted to consider and redress complaints related to sexual harassment. The Constitution of ICC is as per the Act and includes external member from NGO or person familiar with the issues relating to sexual harassment.

- a) An independent director who is familiar with the issues relating to sexual harassment.
- b) At least two members from amongst the employees who are committed to the cause of the women or the person familiar with issues relating to sexual harassment
- c) One-half of the total members must be women

Nomination: The Managing Director nominates the Presiding Officer and the members of ICC.

Term of Office: The Presiding Officer and every member of the Internal Complaints Committee will hold the office for a period not exceeding three years from the date of the nomination.

The ICC is governed by the rules of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal Act, 2013 and the Ministry of Women & Child Development notification dated 9th December 2013 or any other legislation, rules or notifications as may be enacted later on.

III. Redressal of Complaints:

- The Internal Complaints Committee (ICC) in the Organisation is responsible for attending the complaints on cases of Sexual Harassment. The names and the contact details of the members of the ICC are available on HR drive.
- Any individual who is applicable under the policy and feels is being sexually harassed may submit a complaint of the alleged incident to the ICC within 15 days from the date of the incident of sexual harassment. The complaint needs to be signed by the complainant and submitted to Human Resources (HR). However, if HR is involved then to the Managing Director. If the Managing Director is involved then it may be submitted to the Chairperson. All such cases are then forwarded to ICC for inquiry.
- If the complainant is unable to make a complaint in writing, he/she should intimate the ICC and the ICC would render all reasonable assistance to the complainant for making the complaint in writing.
- Though it is desirable that the complaint is given within 15 days, however, there may

- be situations, where the complainant may not be able to file the complaint within the specified time due to compelling circumstances, in such cases, the time of giving complaint maybe extended up to three months.
- Where the Complainant is unable to give the complaint on account of his/her physical or mental incapacity the legal heir or such other person related to the complainant may make a written a complaint on her/his behalf to the ICC.
- The Committee maintains a register to endorse the complaint received by it and keeps the contents confidential, if it is so desired, except to use the same for discreet investigation.
- ICC holds a meeting with the complainant after receipt of the complaint. The complainant will be formally intimated of the date of the meeting.
- If the complaint does not fall under the purview of sexual harassment or the complaint is not an offence under the sexual harassment, the same is to be dealt under the disciplinary procedure of the Foundation. The investigation of such complaints is not under the purview of ICC.
- The Complainant may be given an opportunity to settle the matter with the respondent through conciliation, provided monetary settlement is not the basis of conciliation.

IV. Inquiry:

- During the enquiry both parties will be given an opportunity to represent. The copies of the findings will be given to both the parties so that they can represent the committee against the findings.
- The ICC conducts the inquiry within seven days of the receipt of the complaint.
- During the inquiry the Complainant or the Respondent may produce witnesses or documents.

V. Report submission and action taken:

- ICC submits the report to Managing Director within ten days of the completion of the inquiry
- The copy of the report is given to the Complainant and the Respondent.
- If the allegation is proved, action will be taken against the Respondent as per the Standards of Conduct;
 - A letter of warning that will be placed in the personal file of the respondent
 - Stop the increment with or without cumulative effect
 - Reduction in hierarchy
 - Termination/dismissal from the services of the Company.
 - Any other action that the Disciplinary Authority may deem fit.
- During the inquiry if it is found that the allegation against the respondent is malicious or if the complainant or any other person makes such complaint knowing it to be false or produces any forged or misleading document, action will be taken against them as per the Standards of Conduct/Standing Order.
- However, if the Complainant is unable to substantiate a complaint or provide adequate proof, no action will be taken.
- During the inquiry, if it is proved that the witness/witnesses have given false evidence or produced any forged documents, action will be taken against them in accordance with the Standards of Conduct/Standing Order.
- The proceedings, conciliation or the action taken etc. is to be not made public or published and the names or addresses will not be disclosed.

Support provided by the Management to the Complainant:

- Provide a safe working environment at the workplace which also includes employees, visitors, clients or any other internal or external individuals
- Provide assistance to the complainant if he/she chooses to file a complaint in relation to the offence under the Indian Penal Code.
- Treat sexual harassment as a misconduct under the Standards of Conduct

Responsibilities:

Employee:

- Participate in the POSH programme
- Seek clarification on POSH including what constitutes Sexual Harassment
- Understand the process of filing a complaint
- Support the fellow employee if he/she is sexually harassed
- Acknowledgement that the policy is understood

Management:

- Encourage employees to attend the POSH Awareness programme
- Clarify doubts on POSH
- Address employees' concern on POSH
- Support employees if they are sexually harassed

Human Resources:

- Organize Awareness programmes on POSH
- POSH policy to be displayed in a prominent location
- Seek acknowledgement from all employees that they have understood the POSH Policy

▪ **EFFECTIVE DATE**

These guidelines and procedures shall supersede all other earlier guidelines/rules on the subject matter and shall come into force with effect from November 14, 2024.

Policy Owner: Human Resources

- **Process Owner: Human Resources**