



POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH) IN B-RIGHT REALESTATE LIMITED

This version of the policy is effective from 13th November 2025 and supersedes all prior policies and communication on this matter.

1. Introduction

B-Right Real Estate Limited (“BRRL/Company”) believes in equal employment opportunity. We do not tolerate verbal or physical conduct creating an intimidating, offensive, or hostile environment for employees. Harassment of any kind including sexual harassment is forbidden in the Company and every employee has the right to be protected against it. We are committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company believes that all employees of the Company have the right to be treated with dignity. The Sexual Harassment Policy has been formed under the provisions of The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013, to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

2. Scope

This policy is applicable to employees, workers, volunteers, probationer and trainees including those on deputation, part time, contract, working as consultants or otherwise (whether in the office premises or outside while on assignment). This policy shall be considered to be a part of the employment contract or terms of engagement of the persons in the above categories.

This policy applies to all categories of Employees (as defined below) of BRRL, 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.

3. Definitions

- a) **Act:** An Act means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- b) **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- c) **Complaint:** it is meant to construed, defined, understood and interpreted as a formal allegation of Harassment submitted in writing or otherwise by the Aggrieved Woman to the Internal Complaint Committee.

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- d) **Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy.
- e) **Conciliation:** It is a process to resolve conflict/complaint by the Internal Complaints Committee on the specific request of the aggrieved employee in the manner provided under the Act.
- f) **Employee:** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- g) **Employer:** A person responsible for management, supervision and control of the workplace.
- h) **Harassment:** It is any improper conduct by an individual, that is directed at and offensive to another person or persons in the workplace, and that the individual knew or ought reasonably to have known would cause offence or harm. It comprises any objectionable act, comment or display that demeans, belittles, or causes personal humiliation or embarrassment, and any act of intimidation or threat. It includes harassment within the meaning of the “Protection of Human Rights Act, 1993” and applicable international and united nation’s conventions and treaties.

Harassment shall also include Sexual harassment as defined below.
- i) **Internal Complaints Committee:** It means a committee constituted by the Company as per this Policy.
- j) **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.
- k) **Rules:** This shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
- l) **Sexual harassment** may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals with in the course of his/her work who is not employed by the Company.



“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:

- Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - i. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
 - ii. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
 - iii. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will
 - iv. Demand or request for sexual favors
 - v. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
 - vi. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
 - vii. Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
 - viii. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes
 - ix. Giving gifts or leaving objects that are sexually suggestive
 - x. Eve teasing, innuendos and taunts, physical confinement against one’s will or any such act likely to intrude upon one’s privacy; Persistent watching, following, contacting of a person; and
 - xi. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
 - i. Implied or explicit promise of preferential treatment in employment;
 - ii. Implied or explicit threat of detrimental treatment in employment;
 - iii. Implied or explicit threat about the present or future employment status;
 - iv. Interference with the person’s work or creating an intimidating or offensive or hostile work environment; or
 - v. Humiliating treatment likely to affect health or safety.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.



- m) **Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- n) **Workplace:** It includes-
 - a. All offices or other premises where the Company's business is conducted.
 - b. All company-related activities performed at any other site away from the Company's premises.
 - c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
 - d. Any place visited by the Employee arising out of during the course of employment including transportation by the Company for undertaking such journey.

Where the alleged incident occurs to our employee by a third party while on a duty outside our premises the Company shall perform all reasonable and necessary steps to support our employee.

4. Policy Requirements

- a) Employees are responsible for fostering a Harassment free work environment.
- b) All Employees shall be informed of this policy during recruitment and by general publicity during the course of their employment with the Company and shall be deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- c) Early Resolution Mechanism should be used to resolve problems of Harassment at the outset.
- d) The complaint process, including the investigation, if necessary, should be completed without undue delay.
- e) Corrective action must be taken timely in all situations of Harassment and the same must be communicated to all the parties involved in it.
- f) Harassment may result in corrective or disciplinary measures being taken, up to and including termination of respondent. Disciplinary or corrective measures may also be taken against the following:
 - a. any manager who is aware of a Harassment situation and who fails to take corrective action;
 - b. anyone who interferes with the resolution of a complaint by threats, intimidation or retaliation;
 - c. or anyone who files a complaint that is frivolous or in bad faith.

5. Roles and Responsibilities

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a) Refusing to participate in any activity which constitutes harassment



- b) Supporting the person to reject unwelcome behavior
- c) Acting as a witness if the person being harassed decides to lodge a complaint

6. Redressal Mechanism – Formal Intervention

In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy.

A. Internal Complaints Committee (Henceforth known as “IC” or “committee”)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company. The detail of the committee is notified to all covered persons at the location (workplace).

The committee at each location comprises of:

- i. Presiding Officer: A woman employed at a senior level in the organization or workplace.
- ii. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge
- iii. One external 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
- iv. At least one half of the total members nominated being women. The committee will be responsible for:
 - a. Receiving complaints of sexual harassment at the workplace
 - b. Initiating and conducting inquiry as per the established procedure
 - c. Submitting findings and recommendations of inquiries
 - d. Coordinating with the employer in implementing appropriate action
 - e. Maintaining strict confidentiality throughout the process as per established guidelines
 - f. Submitting annual reports in the prescribed format

B. Committee Members

Internal Complaint Committees have been formulated in the Company.

The details about the current members of the IC and nominations from various divisions are enclosed in **Annexure A**.

C. Lodging a Complaint

An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3

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months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

- i. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. her co-worker; or
 - c. an officer of the National Commission for Women or State Women's Commission; or
 - d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman
- ii. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. a special educator; or
 - c. a qualified psychiatrist or psychologist; or
 - d. the guardian or authority under whose care she is receiving treatment or care; or
 - e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care
- iii. If the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
- iv. If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

The complaint shall be submitted by the complainant to the IC in writing or shall be submitted to the IC electronically at cs@b-rightgroup.com. The complaint can also be physically submitted to any IC member.

D. Receiving a Complaint (guidelines)

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are to be kept in mind by the receiver of the complaint:



- a. Complaints are listened to and the complainant is informed that the Company takes their concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
- b. Situations are not pre-judged. Written notes are to be taken while listening to the person. When taking notes, complainant's own words, where possible, are to be used accurately. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- c. All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- d. The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

E. Resolution procedure through conciliation

Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman.

No monetary settlement can be made as a basis of conciliation.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint.

The committee shall provide copies of the settlement to complainant & respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

Process:

- i. The complainant reports a complaint in writing/verbally to the appointed manager if referred by the Internal Complaints Committee.
- ii. Appointed manager addresses the situation and investigates the complaint.
- iii. Appointed manager provides opportunity to all parties (complainant, respondent, witness) to explain the briefs of the complaint.
- iv. If the supervisor/manager is not a party, then inform them also in the process.
- v. Try to pacify and resolve the issue amicably between the parties.
- vi. If resolved with the consent of all the parties involved, then record the settlement arrived between the parties and forward the same to the Board



of Directors to take action as specified in the recommendation. Further appointed manager shall intimate all the parties involved the outcome of the complaint and provide the copies of the settlement as recorded to the aggrieved Employee and respondent.

- vii. However, no monetary settlement shall be made as a basis of Conciliation between the parties. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

F. Resolution procedure through formal inquiry

The committee will initiate inquiry in the following cases:

- a. No conciliation is requested by aggrieved woman
- b. Conciliation has not resulted in any settlement
- c. Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent

I) Manner and Procedure of inquiry into complaint:

- i. Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- ii. The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.
- iii. At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- iv. The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- v. Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- vi. Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- vii. Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.
- viii. The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- ix. If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- x. The Committee shall call upon all witnesses mentioned by both the parties.

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- xi. The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- xii. If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- xiii. No legal practitioner can represent any party at any stage of the inquiry procedure
- xiv. The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice.
- xv. In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present
- xvi. The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy
- xvii. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- xviii. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.

II) Interim relief

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- i. Transfer the complainant or the respondent to any other workplace
- ii. Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled
- iii. Prevent the respondent from assessing complainant's work performance
- iv. Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the same is informed to the committee.

III) Termination of Inquiry



Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice is to be given to the party, before termination of enquiry or ex-parte order.

IV) Action to be taken after inquiry

Post the inquiry, the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

V) Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

VI) Complaint substantiated

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- a. Counseling
- b. Censure or reprimand
- c. Apology to be tendered by respondent
- d. Written warning
- e. Withholding promotion and/or increments
- f. Suspension
- g. Termination
- h. Or any other action that the employer may deem fit.

The Company is required to act upon the recommendations within 60 days and confirm to the committee. Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

7. Penal Consequences of Sexual Harassment

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a



‘cognizable offense’ i.e. a person charged with Sexual Harassment may be arrested without a warrant.

8. Malicious Allegations

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

9. Confidentiality

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

10. Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

11. Awareness

Awareness sessions are to be organized to:

- a. Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- b. Carry out orientation programs and seminars for the Members of the IC.
- c. Conduct capacity building and skill building programs for the Members of the IC.
- d. Declare the names and contact details of all the Members of the IC.
- e. Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.



12. Monitoring

The Internal Complaints Committee will monitor results in achieving the policy objective and statement.

13. Legal Compliance

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:

- a. number of complaints of Sexual harassment received in the year
- b. number of complaints disposed of during the year
- c. number of cases pending for more than 90 days
- d. number of workshops or awareness program against Sexual Harassment carried out
- e. nature of action taken by the employer or District Officer

14. Amendment

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.



“Annexure A” Composition of Internal Complaints Committee

As per Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal)
Act, 2013

Sr. No.	Name	Designation
1.	Mrs. Jinal Mehta	Presiding Officer
2.	Ms. Bhagyashree Mehadia	Member
3.	Ms. Komal Sawant	Member
4.	Mr. Monarch Sheth	Member