

**Brahmani River Pellets Private Limited, India**  
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# **Prevention of Sexual Harassment at Workplace Policy**

**January'2026**

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# 1. Background

1.1 India being a democratic country ensures certain rights and freedom to all citizens whether female or male. Accordingly, women are entitled to Fundamental Rights under the Constitution of India: Fundamental Right to equality under Article 14 and 15, Right to Life and Living with Dignity under Article 21 as well as the Right to Practice any Profession, Occupation which also includes the Right to a safe environment free from Sexual Harassment.

1.2 Additionally, on the 25th of June 1993 as a commitment towards Women's safety, rights and wellbeing India was signatory to the Human Rights Convention on Elimination of all Forms of Discrimination (CEDAW) which focusses on Protection of Women from Sexual Harassment and Right to Work with Dignity as Human Rights world over.

1.3 In agreement with the Constitution of India and CEDAW and given the increase in cases of sexual harassment of women at the work place, the Sexual Harassment Bill 2010 was passed by the Indian Parliament on 9th December 2013. The Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act (14 of 2013) and Rules 2013 ultimately come into force. The Supreme Court of India mandated all the organizations to implement measures in their workplace to prevent sexual harassment against women including setting up of an Internal Complaints Committee (ICC) to address these issues and Local Complaints Committees (LCC) to be set up at each of their branches.

## 2. Purpose & Objective

2.1 BRPL strongly believes in providing a safe and secure work environment for all its employees, visiting clients as well as contractual workers. BRPL would like to provide an enabling and safe environment for women to work in. At the same time BRPL also would ensure that the workplace is Gender Neutral and a true and honest attempt will be made in the same direction. Although, the Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act (14 of 2013) and Rules 2013 centers around women, the committees set up for the purpose will also be open to address concerns of men if needed.

- 2.1.1 BRPL is committed to promote a productive work environment where every employee female or male can work without being intimidated, offended or being subjected to any form of hostility. The company will not tolerate any form of physical, psychological, verbal or any other form of abuse meted out to any of its employees, contractual workers, clients or vendors.
- 2.1.2 BRPL hereby establishes that inappropriate behavior of sexual nature, and / or retaliation will not be tolerated and thus sets forth procedures for resolving such allegations and Redressal of any such grievances.
- 2.1.3 BRPL will effectively implement guidelines issued by the Honorable Supreme Court of India and these documents will act as its policy
- 2.1.4 BRPL will prevent discrimination and sexual harassment against women, by promoting gender amity among employees and workers as well as ensure processes are gender just. Grievance redressal mechanisms will be put in place for the prohibition, resolution, settlement and prosecution of acts of discrimination and sexual harassment against women, by the employees and workers.
- 2.1.5 BRPL will address cases of discrimination and sexual harassment against women, in a time bound manner, aiming at ensuring support services to the aggrieved woman and termination of the harassment through an internal complaints committee. Recommend appropriate punitive action against the guilty party.

### **3. Entitlement**

3.1 This policy is applicable to all permanent, temporary and contractual employees and workers of BRPL.

3.2 It is also applicable to Associates and Clients of BRPL when they visit the BRPL premises or when they are visited by any permanent, temporary and contractual employee.

## 4. Definition of Sexual Harassment at Workplace

4.1 Sexual Harassment at the workplace is the unwelcome or uninvited sexually determined behavior (whether directly or by implication) which is offensive, embarrassing, intimidating, humiliating and which may affect an employees work, performance, health, career, livelihood, morale or self-respect.

4.2 Harassment may be caused by a perpetrator who may be male or female to a male, female employee, worker, client, associate, vendor

4.3 Sexual harassment would include sexual innuendoes, inappropriate sexual gestures and propositions for dates or sexual favours. In more blatant forms, such harassment may include leering, pinching, grabbing, hugging, patting, brushing against and touching.

4.4 The Supreme Court's guidelines describe physical contact or advances; demand or request for sexual favours; sexually colored remarks and showing pornography as offensive conduct.

4.5 Sexual harassment takes serious tones when granting of sexual favours is put forward as a term or condition of the individual's employment, when it interferes with the individual's work performance or it creates an intimidating or hostile work environment. The offensive conduct could be exhibited by a superior, a colleague, a subordinate or a client.

4.6 Clause 3 of the Act provides for prevention of sexual harassment. It provides that no woman shall be subjected to sexual harassment at any workplace.

4.6.1 As per the bill, Sexual Harassment [Sec2(m)] includes unwelcome sexually determined behavior (whether directly or by implication), Such as

4.7 According to the Supreme Court guidelines Sexual harassment can be defined as "unwelcome" sexually determined behavior (whether directly or by implication) as:

- i. Physical contact and advances;
- ii. Demand or request for sexual favours;
- iii. Sexually coloured remarks;
- iv. Showing pornography; and

- v. Other unwelcome physical, verbal or non-verbal conduct of a sexual nature. (Vishaka judgment by Supreme Court)

The following is also sexual harassment and will be covered by the committee:

- vi. Eve-teasing,
- vii. Unsavory remarks,
- viii. Jokes causing or likely to cause awkwardness or embarrassment
- ix. Innuendos and taunts,
- x. Gender based insults or sexist remarks,
- xi. Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like,
- xii. Touching or brushing against any part of the body and the like,

- xiii. Displaying pornographic or other offensive or derogatory pictures, cartoons, pamphlets or sayings,
- xiv. Forcible physical touch or molestation and
- xv. Physical confinement against one's will and any other act likely to violate one's privacy

Sexual harassment which is unwelcome sexual advances, requests for sexual favors, and/or other verbal, visual or physical conduct of a sexual nature where:

- xvi. Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- xvii. Submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting that individual; or
- xviii. Such conduct has the purpose of or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

4.8 BRPL believes employees & their safety are foremost since employees and workers are the biggest asset to the company.

4.9 This policy is an attempt to take precautionary measures and to create good & safe environment to work and foster work ethics.

## 5. Terminology in Use

The following terminology will be in use based on the Act:

### 5.1 Aggrieved Woman:

A woman of any age who alleges to be subjected to any act of sexual harassment. This policy includes all women in the work place (employed/ not employed/ ad hoc employment / including domestic workers).

### 5.2 Perpetrator:

The person/ persons causing harassment to an employee

### 5.3 Chairperson:

The Head of the Internal Complaints Committee (ICC) who would be a senior employee of the institution with experience on the subject or in the absence of who under chapter 2, Clause 4 (I), 2 (a) may be employed from another organization.

### 5.4 Employee:

An individual employed at a work place (regular/ad hoc/ daily wage employment) directly or through any agent with or without the knowledge of the organization and irrespective of the amount paid.

### 5.5 Employer:

Person/ Board/ Committee/ Management responsible for employing people, paying remunerations, policy formulation and administration of

### 5.6 Sexual Harassment:

Unwelcome sexually linked innuendoes and gestures such as physical contact, verbal/ non-verbal conduct of sexual nature, request for sexual favours, sexually colored remarks, screening of pornography or any other conduct of such nature.

### 5.7 Workplace:

The organization and any place visited by the employee during the course of work not excluding sports institutes, stadiums and other places of outings.

## 6. Constitution of the POSH Committee at BRPL

6.1 In compliance with clause 4 of the Act, BRPL has in place three Internal Complaints Committees:

- a) Internal Complaints Committee (ICC) - Registered Office, IPICOL House, Bhubaneswar, Odisha
- b) Internal Complaints Committee (ICC) - Pellet Plant, Jajpur
- c) Internal Complaints Committee (ICC) - Beneficiation Plant, Barbil

6.2 In keeping with the Guidelines, the Committees have been formed in accordance with the following conditions:

6.2.1 The Committee shall have five (5) members;

6.2.2 (ii) At least two (2) of such members shall be women and one (1) man.

6.2.3 At least one member of the Committee shall be from a non-governmental organization ["NGO"] that operates on a secular non-profit basis and is involved in work concerning gender justice;

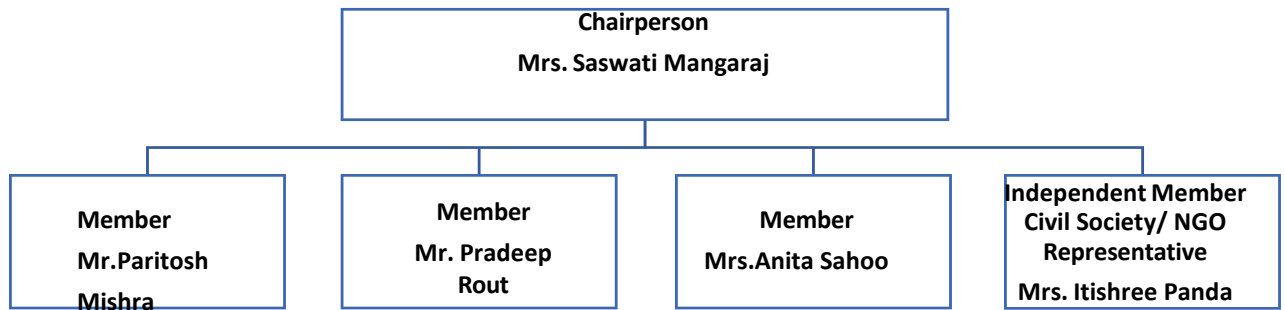
6.2.4 The Committee shall be headed by one member ["Chairperson"]; who shall mandatorily be a woman.

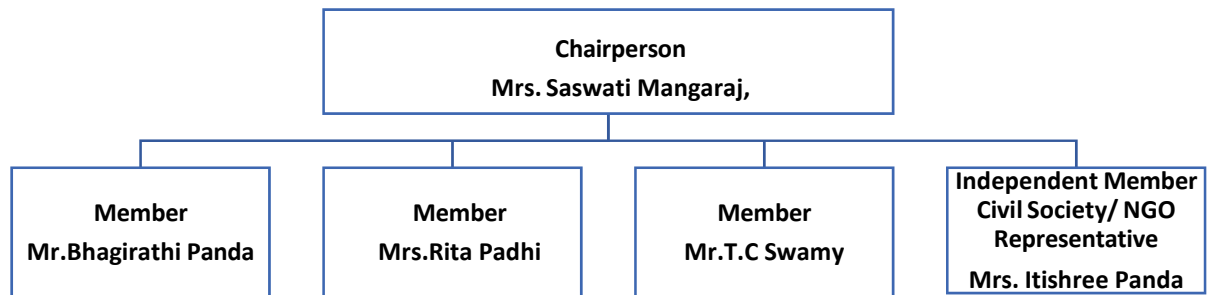
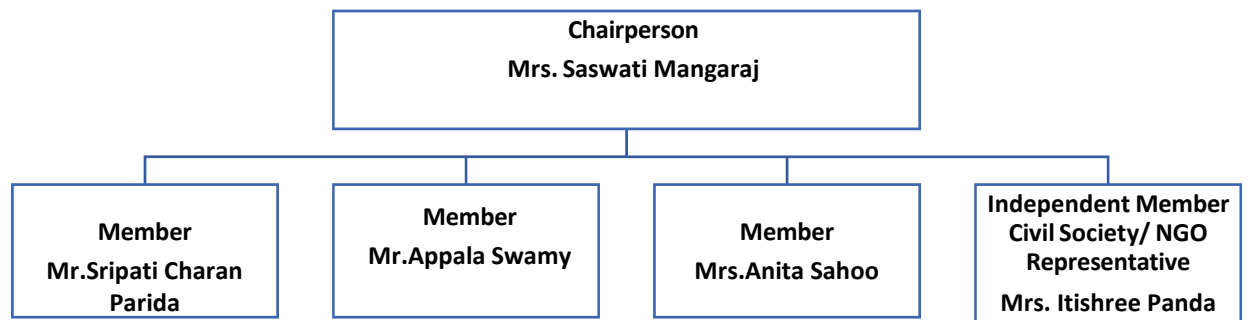
6.3 The ICC shall have women members in majority. It will be headed by a senior woman employee as Chairman (who has experience in the subject). However, in the absence of such an employee a senior woman and an experienced person from either the head office or another organization may head the committee in the ICC .

6.4 The committees shall also have an independent member who is committed for the cause for women (NGO/ civil society/ gender expert).

6.5 Composition of the three Internal Complaints Committees (ICC)

**a) Location: Registered Office, IPICOL House, Bhubaneshwar, Odisha**



**b.Location: Pellet Plant, Jajpur****C)Location: Beneficiation Plant, Barbil**

6.6 Impartiality, confidentiality and fast track redressal of grievances of the aggrieved woman/ employee will be ensured by the company.

## 7. Role of the Internal Complaints Committees (ICCs)

- 7.1 Ensuring that the management provides a safe working environment for women/employees.
- 7.2 Receiving complaints from employees, scrutinize complaints, addressing grievances of the aggrieved woman.
- 7.3 Deciding whether facts in the complaint make out a case of “sexual harassment” in light of the definition contained in the Policy and ensure she gets justice.
- 7.4 Look into the truth of the allegations mentioned in the complaint. In case of false cases, take appropriate disciplinary action against complainant for false allegations.
- 7.5 Look into the truth of any allegation of retaliation against / victimization of the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.
- 7.6 Recommending penalties / action to be taken against any person found guilty of having sexually harassed the complainant, up to and including termination, to the HR Department.
- 7.7 Recommending penalties / action to be taken against any person found guilty of having retaliated against / victimized the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.
- 7.8 Recommending appropriate psychological, emotional and physical support (counselling, security and other assistance) for the victim.
- 7.9 Recommend the penalties / action to be taken against any person found guilty of having made false claims of having been sexually harassed, up to and including termination, to the HR Department.
- 7.10 Monitoring follow-up action to be taken by the HR Department on receipt of the Report of the Committee.
- 7.11 Facilitating in lodging a case with the police for justice of the employee under IPC ACT 509 (word, gesture or any act intended to insult the modesty of a woman) in case the grievance is serious in nature and requires police assistance and cannot be resolved at the level of the ICC, the committee will facilitate .

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7.12 Maintaining confidentiality under all circumstances.

7.13 Holding regular orientation programs and refresher programs to make staff aware of the Act, procedures and sensitize them towards this subject and related subjects.

7.14 Conducting and facilitating regular employer-employee interaction platforms to foster the sense of amity and equality.

## 8. Power of the Committee

- 8.1 Power to summon witnesses, call for documents, any information from any employee. The committee can summon both the aggrieved persons as well as the perpetrator by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.
- 8.2 Power to direct any relevant document or information that the same be produced, or that a clear reproduction in writing of the same be produced recorded or stored by means of a mechanical, electronic or other device.
- 8.3 Power to (i) make copies of such documents / information or extracts there from; or (ii) retain such documents / information for such period as may be deemed necessary for purposes of the proceedings before it.
- 8.4 Power to issue interim directions to / with regard to any person participating in the proceedings before it.
- 8.5 Power to recommend action to be taken against the Perpetrator or any person found guilty of (a) sexually harassing the complainant; (b) retaliating against / victimizing the complainant or any other person before it; and (c) making false charges of sexual harassment against the accused person.

## 9. Procedure for Approaching the Committee and Filing complaints

### a) Procedure for approaching the Committee

9.1 This policy is applicable to all employees and third party staff. A complaint of discrimination or sexual harassment may be lodged by the aggrieved person or a third party. The complainant will need to give a written complain either on paper or via email to the member/s including the Chairperson of the ICC committee. The committee/s will study the case and a meeting will be called, the case will be discussed and action taken accordingly.

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9.2 However, if the aggrieved person does not want to register a complaint with the ICC member/s who are also employees of BRPL, they may directly submit the complaint to the NGO/Civil Society/ Gender Expert who is an independent member of the committee/s.

9.3 If the complaint is made to the CEO/ Managers/ Supervisors and others, it is their responsibility to immediately report the same to the ICC members.

9.4 In all such cases, it will be ensured that confidentiality is maintained at any cost and there is no bias. Disciplinary action will be taken against the person receiving complaint if there is breach of confidentiality.

9.5 All complaints and processes should be done keeping the NGO/Civil Society/ Gender Expert who is an Independent member of the committee in loop and seeking their advice.

**b) Procedure for filing complaints by the Aggrieved Person:**

9.6 The aggrieved person should first inform the perpetrator to stop this behavior with effect from that very moment

9.7 The aggrieved person should immediately document the incident in the following manner specifying:

9.7.1 Date, time, place of incident;

9.7.2 Specific unwelcome behavior;

9.7.3 Your response;

9.7.4 Names of witnesses; and

9.7.5 Copies of documentation (e.g., notes, e-mails, pictures, etc.)

9.8 The aggrieved person should also include details of what happened, who is the alleged perpetrator, what did she/he do, where did the incident take place, what did the aggrieved person do.

9.9 The aggrieved person should include frequency of occurrence of the incident , witnesses present, feelings of the aggrieved persons at that point of time, extent to which the aggrieved persons' work was affected, any prior documentation or documentation at that moment did the aggrieved person document the incident at any point of time, what remedy does the aggrieved person seek.

9.10 In case the aggrieved person is the subject of retaliation, she should immediately report this to the ICC.

9.11 Complaints should be immediately reported to the ICC. In case a complaint is lodged by an aggrieved person with its management or the team manager, the management or team manager will be responsible forwarding to the ICC (all members). In case the aggrieved person is not in a condition to report an authorized person from the aggrieved person's family may file a complaint.

9.12 In case the aggrieved person is male, the case will be looked into in a same manner. However, for procedures for addressing grievance of the male aggrieved person, other criminal laws will be referred to by a suitable lawyer.

## 10 Procedure to be followed before the Committee

- 10.1 Either the Management, project manager or the aggrieved person shall forward the written complaint to the Committee upon its formation. In case the aggrieved person is not in a position to give a written complaint or the aggrieved person is deceased, then as per the Act, an authorized person from the aggrieved person's side will submit the complaint. Necessary action will be taken by the committee and based on the nature of the case police may be contacted by the ICC as required.
- 10.2 The Committee may direct the complainant to prepare and submit a detailed statement of incidents if the written complaint lacks exactness and required particulars, within a period of two (2) days from such direction or such other time period that the Committee may decide.
- 10.3 The Committee shall direct the accused employee(s) to prepare and submit a written response to the complaint / allegations within a period of four (4) days from such direction or such other time period as the Committee may decide.
- 10.4 Each party shall be provided with a copy of the written statement(s) submitted by the other.
- 10.5 The Committee shall conduct the proceedings in accordance with the principles of natural justice and in keeping with the Guidelines and the Policy. It shall allow both parties reasonable opportunity of presenting their case. However, should the accused choose not to participate in the proceedings, the Committee shall continue ex parte.
- 10.6 The Committee shall allow both parties to produce relevant documents and witnesses to support their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original / true copy.
- 10.7 The party against whom the document / witness is produced shall be entitled to challenge / cross-examine the same.
- 10.8 The Committee shall sit on a day-to-day basis to record and consider the evidence produced

- 10.9 As far as practicable, all proceedings of the Committee shall take place in the presence of both parties.
- 10.10 Minutes of all proceedings of the Committee shall be prepared and duly signed by the members of the Committee.
- 10.11 The Committee shall make all endeavors to complete its proceedings within a period of fifteen (15) days from its formation.
- 10.12 The Committee shall record its findings in writing supported with reasons and shall forward the same with its recommendations, to the HR Department, within a period of five (5) days from completion of the proceedings before it. In case the Committee finds that the facts disclose the commission of a criminal offence by the accused person, this shall be specifically mentioned in the Committee's report.
- 10.13 If, in the course of the proceedings before it, the Committee is satisfied that a prima facie case of sexual harassment is made out against the accused employee(s) and that there is any chance of the recurrence of any such action, or that it is required to do so in the interests of justice, it may, on the request of the complainant or otherwise, direct the transfer of such employee(s) from their present position, or even their suspension, pending the inquiry. Such decision shall be binding on the parties and shall be immediately implemented by the HR Department.
- 10.14 If, in the course of the proceedings before it, the Committee is satisfied that any person has retaliated against / victimized the complainant or any person assisting her as a result of the complaint having been made or such assistance having been offered, the Committee shall report the same in writing, to the HR Department, with reasons and with recommendations of the action to be taken against such person.
- 10.15 If, at the culmination of the proceedings before it, the Committee is satisfied that the complainant has knowingly brought false charges of sexual harassment against any person, it shall report the same in writing to the HR Department, with reasons and with recommendations of the action to be taken against such person.

## 11. Miscellaneous

- 11.1 Committees will maintain confidentiality with regard to all proceedings, including the statements and other material adduced as evidence before the Committee shall be strictly confidential. It will also ensure that the parties before it and their representatives also maintain strict confidentiality in all respects.
- 11.2 The decision of the Committee on any matter within its competence shall be considered final and no appeal / challenge to the same shall lie to any person / body in BRPL.
- 11.3 It will be the responsibility of the HR Department to scrutinize the Committees report and recommendations of the Committee and take appropriate action against the guilty person in accordance with the Guidelines, Policy, and gravity of the behavior disclosed in the Committee's report and as suggested by the committee. Any changes thereof should be notified to the committee and their concurrence taken. This is for both in case of the aggrieved person as well as perpetrator.
- 11.4 In case the conduct disclosed in the Committee's report is of a nature that amounts to a criminal offence under the law of the land, appropriate action shall be initiated by the HR Department, for making a police complaint in respect of the same.
- 11.5 In case of sexual harassment of any woman employee by any person not employed by BRPL or any of its clients or vendors the HR Department shall take all steps necessary to reasonably assist the aggrieved employee in terms of providing her with psychological, emotional and physical support and enabling her to take recourse to the law.

## 12. Conclusion

12.1 BRPL is committed to creating a safe work environment leading to better workforce participation and improved performances to the satisfaction of both the employees and employer.

12.2 BRPL is committed to ensuring human right of women to work in a safe environment and to undertake proactive measures to ensure safety of women in workplaces.

12.3 BRPL is committed to equality and equal opportunity and therefore implements this Anti-Sexual Harassment Policy at Work Place for women. Since men too may face sexual harassment and may be aggrieved persons as well as men keeping in mind that Gender Neutrality is also essential, the ICC will also look at cases submitted by men and other gender. While the Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act (14 of 2013) and Rules 2013 focusses on women, in case men have grievances the committee will look into it but laws applicable for addressing grievances will be as per other laws.

12.4 BRPL looks forward to all employees taking to this act positively and as joint effort to make the workplace even better.

| Brahmani River Pellets Private Limited                                                                              |                                |            |             |                                                                                |                                                                                        |                                                      |                                                     |                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------|--------------------------------|------------|-------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------------------------------|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Internal Complaints Committee (ICC)                                                                                 |                                |            |             |                                                                                |                                                                                        |                                                      |                                                     |                                                                                                               |
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