

**BALKRISHNA INDUSTRIES
LIMITED**

**POLICY ON PREVENTION OF
SEXUAL HARASSMENT AT
WORKPLACE**

Policy Title		Prevention of Sexual Harassment at Workplace
Issue Number	1	
Issue Date	14 th May, 2015	
Approved by	Board of Directors	
Revision Number	2	
Revision Date	Revision 1: 19 th March, 2024	
	Revision 2: 22 nd March 2025	

Objective & Preambles	<p>Balkrishna Industries Limited ("the Company") is committed to create a safe and healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Towards attaining this objective, it is essential that each employee deals with their colleagues and third parties with fairness and respect.</p> <p>The Company also believes that all its stakeholders have the right to be treated with dignity, respect and without any bias, prejudice or discrimination, either on the basis of gender, caste, religion or creed. Sexual harassment at workplace in any form of unwanted or unwelcomed behavior, advances and /or harassment of a sexual nature that affects the dignity of a woman, including a visitor at any workplace of the Company is a grave offence and is, therefore, punishable.</p> <p>As a responsible corporate citizen, the Company is fully committed to the above cause and will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that women at its premises are not subjected to any form of sexual harassment.</p> <p>This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and in the event of conflict between this policy and the Act, the Act shall prevail.</p>
Scope and Applicability	<p>This Policy extends to all employees and stakeholders of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable. Company aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by</p>

	any employee during their tenure.
<p>Definitions</p>	<p>(i) “aggrieved woman” means in relation to a workplace, a woman, of any age whether employed by the Company or not, who alleges to have been subjected to any act of sexual harassment by the respondent at such workplace;</p> <p>(ii) “employee” means a person employed at a 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such names.</p> <p>(iii) “employer” means Balkrishna Industries Limited.</p> <p>(iv) “respondent” means a person against whom the aggrieved woman has made a complaint under section 9 of the Act.</p> <p>(v) “sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: — (a) physical contact and advances; or (b) a demand or request for sexual favours; or (c) making sexually coloured remarks; or (d) showing pornography; or (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.</p> <p>(vi) “workplace” means:</p> <p>(a) Premises, locations, establishments, enterprises, institutions, offices, branches or units in India established by the Company or by its subsidiaries which are controlled by the Company.</p> <p>(b) Places visited by the employee in India arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking such journey.</p> <p>The capitalized words mentioned in this policy but not defined shall have meaning ascribed to them in the Act.</p>
<p>Roles and Responsibilities of Individuals and Managers</p>	<p>It is the responsibility of all to respect the rights of others and to never encourage sexual harassment. It can be done by: (a) Refusing to participate in any activity which constitutes sexual harassment (b) Supporting a person to reject such unwelcome behavior (c) Acting as a witness if a person being sexually harassed decides to lodge a complaint. All are encouraged to advise others of such behavior that is unwelcome. Often, some behaviors are not intentional. However, this does not make it acceptable and might not</p>

	<p>necessarily be a defense given there is focus on the impact on the complainant and not on the intent of the accused.</p> <p>All managers at Company must endeavour to ensure that nobody is subjected to sexual harassment and there is equal treatment in this regard. They must also endeavour to ensure that all employees understand that sexual harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.</p>
<p>Internal Complaints Committee</p>	<p>(1) The Company shall by an order in writing, constitute a Committee to be known as the Internal Complaints Committee (“ICC”). Where the offices or administrative units of the workplace are located at different places or divisional or sub-divisional level, ICC shall be constituted at all administrative units or offices as far as may be required under law.</p> <p>(2) The ICC shall consist of the following members to be nominated by the employer, namely: — (a) a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees: Provided that in case such a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the remaining seven locations / divisions of the Company; (b) not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; (c) one 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.</p> <p>At least one-half of the total members of ICC shall be women.</p> <p>(3) The Presiding Officer and every Member of the ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Company.</p>
<p>Internal Complaint Committees Members</p>	<p>ICC has been formulated for all locations / divisions.</p> <p>The details about the current members of the ICC at all locations / divisions are enclosed in Annexure A.</p>
<p>Lodging a Complaint</p>	<p>1) Any aggrieved woman may make a complaint of sexual harassment at workplace in writing to the ICC at their relevant workplace or in case ICC is not so constituted, to the Local Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the ICC, as the case may be, shall render all reasonable assistance to the aggrieved woman for making the complaint in writing with the ICC. Provided further that the ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the aggrieved woman from filing a complaint within the said period</p>

	<p>(2) Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may lodge a complaint.</p>
Inquiry Process	<p>ICC shall, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent or in such manner as may be prescribed. Provided that where the aggrieved woman informs the ICC that any term or condition of the settlement arrived at under sub-section (2) of section 10 of the Act has not been complied with by the respondent, the ICC shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police: Provided further that where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before ICC. The inquiry as mentioned herein above shall be completed within a period of ninety days.</p>
Action during the pendency of inquiry	<p>During the pendency of inquiry on a written request made by the aggrieved woman to ICC, the Company shall on recommendation of the ICC either (a) transfer the aggrieved woman or the respondent to any other workplace or (b) grant leave to the aggrieved woman up to a period of three months or (c) grant such other relief to the aggrieved woman as may be prescribed under the Act. The leave as mentioned herein above shall be in addition to the leave aggrieved woman would be otherwise entitled.</p>
Conciliation	<p>(1) The ICC may, before initiating an inquiry, at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation: Provided that no monetary settlement shall be made as a basis of conciliation.</p> <p>(2) Where settlement has been arrived at, the ICC shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation.</p> <p>(3) The ICC shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.</p> <p>(4) Where a settlement is arrived at, no further inquiry shall be conducted by the ICC.</p>
Disciplinary Action	<p>(1) Appropriate action may include written warning, written apology, deduction of salary or wages for being paid as compensation to the Aggrieved Woman or her legal heirs, debarment from duties, bar increments, promotions, bonus, extended probation, suspension, transfer or termination or dismissal without notice of the harasser as per Company policies.</p> <p>(2) The severity of the disciplinary action would be determined by a number of factors, including the severity of harassment from simple apology to dismissal.</p> <p>(3) If any employee who has been found guilty of sexual harassment previously</p>

	<p>is found guilty subsequently again (repeated harasser), then that employee shall be liable for suspension or termination of employment from the Company.</p> <p>(4) The severity of punishment can be higher in the case of accused being at a senior position harassing a junior person who may hesitate to stop such behavior.</p> <p>(5) If the complaint is proved to be false, the complainant can face charges of filing a false complaint and be punished.</p> <p>(6) Punishment levels for similar type of cases at different points in time and at different locations shall be similar.</p> <p>Note: This policy is offered as a tool to employees to fight against sexual harassment, however if on investigation it is proved that the complaint was made with a malicious intent or that forged or misleading documents have been produced before the ICC, strict disciplinary action will be taken against such complainant or witness.</p>
<p>Alternate Legal Remedies</p>	<p>(1) Where the act of sexual harassment or of retaliation, victimization or discrimination against a complainant or any witness amounts to a specific offence under the provisions of the Bhartiya Nyaya Sanhita, 2023 or any other applicable law for time being in force, the Company may initiate appropriate action, including instituting criminal proceedings, in accordance with the applicable law, by making a complaint with the appropriate authority.</p> <p>(2) Additionally, nothing in this policy shall prevent the aggrieved woman or the respondent at any time to seek legal course of action by complaining to police.</p> <p>Third Party Harassment - Where sexual harassment occurs as a result of an act or omission by any third party or an outsider, the Company will provide appropriate assistance to the aggrieved woman in terms of providing support for initiating any preventive or remedial actions.</p> <p>Protection Against Retaliation - the Company prohibits any form of retaliation, victimization, or discrimination against anyone who has reported a suspected episode of sexual harassment or has co-operated in any investigation involving a reported case of sexual harassment.</p>
<p>Appeals</p>	<p>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.</p>
<p>Confidentiality</p>	<p>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 and not published or made known to public or media. Any person contravening the</p>

	confidentiality as mentioned herein is subject to disciplinary action as prescribed under the Act.
Awareness	<p>Company organizes awareness sessions and programs at regular intervals:</p> <p>(a) to 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.</p> <p>(b) for capacity building and skill building of the ICC.</p>
Prohibition of Publication of Contents of Complaint	The contents of the complaint, the identity, names and addresses of the aggrieved woman, respondent and witness, any information relating to the conciliation or inquiry proceedings, recommendation of the ICC and any action taken by the Company with regard to redressal of the complaint of sexual harassment is not published, communicated or made known to the public, press or media and is in compliance with the Act.
Protection against retaliation	Regardless of the outcome of the complaint made in good faith, the person lodging the complaint and any person providing information or any witness, will be protected by the Company from any form of adverse action or retaliation. While dealing with complaints of sexual harassment, the ICC shall ensure that the aggrieved woman or the witness are not victimized or discriminated. Any unwarranted pressures, retaliatory or any other type of unethical behavior or conduct against the aggrieved woman, while the investigation is in progress should be reported by the aggrieved woman to ICC as soon as possible. Disciplinary action will be taken/ recommended by ICC against any such complaints which are found genuine.
Dissemination of the Policy	This Policy shall be communicated to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy. This policy shall also be placed on the website of the Company.
Punishment for False or Malicious complaint and false evidence	When the ICC is of the view that a malicious or false complaint has been made by aggrieved woman or any false or forged or misleading evidence has been produced before it by the aggrieved woman or any person, including witnesses, ICC may recommend to the Company to take necessary action against the aggrieved woman or the witness in accordance with Section 14 of the Act.
Amendment	The Company shall amend or modify this Policy in whole or in part, at any time as may be required in line with the provisions of the Act.

Annexure A

Company Name - Balkrishna Industries Limited

The Company has following six locations / divisions:

- (1) M/s. Balkrishna Industries Ltd., BKT House, C-15, Trade World, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel (W), Mumbai – 400 013, Maharashtra.
- (2) M/s. Balkrishna Industries Ltd., Plot No. C21, MIDC, Phase – I, Behind VICCO Laboratory, Opp. Nandi Palace Hotel, Kalyan Shil Road, Dombivli (East), Dist. Thane – 421203, Maharashtra.
- (3) M/s. Balkrishna Industries Ltd., Plot No. TS-1, MIDC Phase II, Opp. Don Bosco School, Manpada Road, Sagaon, Dombivli (E) 421 204 (Maharashtra)
- (4) M/s. Balkrishna Industries Ltd., F-19 & 20, Gut No. 62, 65 & 66, Wadgaon (Kolhati), M.I.D.C., Waluj, Chhatrapati Sambhaji Nagar - 431 136, Maharashtra, India. Tel : 0240-6649200 | 6649204.
- (5) M/s. Balkrishna Industries Ltd., B-66, M.I.D.C., Waluj, Chhatrapati Sambhaji Nagar - 431 136, Maharashtra, India.
- (6) M/s. Balkrishna Industries Ltd., RICCO Industrial Estate, III RD Phase, Plot No. SP 923, POST – Bhiwadi – 301 019, Rajasthan, Tel. No. 08058091400 / 500.
- (7) M/s. Balkrishna Industries Ltd., Plot No. A-300-305 & E-306-313, RICCO Industrial Area, Chopanki – 301 707, Rajasthan, Tel. No. 09694077004 / 005 / 006.
- (8) M/s. Balkrishna Industries Ltd., Bhuj- Bachau Highway, State Highway No. – 42, Village – Paddhar, Bhuj, Kutch – 370 105, Gujarat, Tel. No. 0283 2248300.

Following are details of ICC at BKT House, C-15, Trade World, Kamala Mills Compound, Senapati Bapat Marg, Lower Parel (W). Mumbai– 400 013, Maharashtra:

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com

5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Following are details of ICC at - M/s. Balkrishna Industries Ltd., Plot No. C21, MIDC, Phase – I,
Behind VICCO Laboratory, Opp. Nandi Palace Hotel, Kalyan Shil Road, Dombivli (East), Dist. Thane –
421203, Maharashtra

M/s. Balkrishna Industries Ltd., Plot No. TS-1, MIDC Phase II, Opp. Don Bosco School, Manpada Road,
Sagaon, Dombivli (E) 421 204 (Maharashtra)

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com
5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	Member	Rohit Kodag	Executive	rohit.kodag@bkt-moulds.com
7	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Following are details of ICC at – M/s. Balkrishna Industries Ltd., B-66, M.I.D.C., Waluj, Chhatrapati Sambhaji
Nagar - 431 136, Maharashtra, India.

M/s. Balkrishna Industries Ltd., F-19 & 20, Gut No. 62, 65 & 66, Wadgaon (Kolhati), M.I.D.C., Waluj,
Chhatrapati Sambhaji Nagar - 431 136 (M.S.), India. Tel : 0240-6649200 | 6649204

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com
5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	Member	Abhay Bhaskar Raye	Sr. Manager	abhay.raye@bkt-tires.com
7	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Following are details of ICC at - M/s. Balkrishna Industries Ltd., RICCO Industrial Estate, III RD Phase, Plot No. SP 923, POST – Bhiwadi. Pin – 301 019, Rajasthan, Tel. No. 08058091400 / 500

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com
5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	Member	Naveen Kaushik	Dy. Manager	naveen.kaushik@bkt-tires.com
7	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Following are details of ICC at - M/s. Balkrishna Industries Ltd., Plot No. A-300-305 & E-306-313, RICCO Industrial Area, Chopanki. Pin – 301 707, Rajasthan, Tel. No. 09694077004 / 005 / 006

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com
5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	Member	Saurabh Singh	General Manager	saurabh.singh@bkt-tires.com
7	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Following are details of ICC at - M/s. Balkrishna Industries Ltd., Bhuj-Bachau Highway, State Highway No. – 42, Village – Paddhar, Bhuj, Kutch, Pin – 370 105, Gujarat, Tel. No. 0283 2248300

Sl. No.	Post of Committee Members	Employee Name	Designation as on	E-mail id
1	Presiding Officer	Pratibha Gawali	AGM	pratibha.gawali@bkt-tires.com
2	Member	Sneha Thakker	Sr. Executive	sneha.thakker@bkt-tires.com
3	Member	Prachi Patel	Sr. Executive	prachi.patel@bkt-tires.com
4	Member	Swapna Tawde	Sr. Executive	swapna.mejari@bkt-tires.com
5	Member	Mehul R Joshi	AGM	mehul.joshi@bkt-tires.com
6	Member	Suhail Upadhaya	Sr. DGM	suhail.upadhaya@bkt-tires.com
7	External Member	Indu Ramani	Co-Founder, Dynamind Creations	ramanindu@yahoo.com

Complaint Form under Sexual Harassment of Women Complaint Form under Sexual Harassment of Women at Workplace Act, 2013 	
Name of Complainant & Employee ID	
Department	
Date of Complaint	
Details of Incidence	
Signature of Complainant	
Received by	
Signature of Receiver	
Complain Number Allotted	