BALRAMPUR CHINI MILLS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

1.0 OBJECTIVE

Policy on Prevention of Sexual Harassment (the "Policy") of Balrampur Chini Mills Limited ("BCML" or the "Company") has been developed in accordance with the BCML Code of Conduct and Business Ethics (the "Code") and other policies adopted by BCML and in conformance with the legal and statutory framework of prevention of Sexual Harassment legislation prevalent in India.

BCML is committed to provide a healthy working environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment.

2.0 SCOPE AND APPLICABILITY

This Policy shall be in addition of and furtherance to the Code.

The Policy applies to:-

- All employees (including Trainees and Retainers) and consultants.
- All the visitors and vendors associated with the Company and visiting any premises of the Company.

3.0 DEFINITION

"Board" shall mean the Board of Directors of the Company.

"Sexual Harassment" shall have the same meaning as assigned to it under Section 2 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

In this Policy, words importing the singular number shall include the plural number and words importing the masculine gender shall, where the context admits, include the feminine and neuter gender.

4.0 PRINCIPLE

It is incumbent on all employees to follow this Policy. Sexual Harassment at the workplace of the Company will be deemed to be a violation / breach of terms of employment and a criminal offence, in addition to violation of gender equality guaranteed under the Constitution of India.

5.0 INTERNAL COMMITTEE

Internal Committee (the "Committee") shall mean the Committee constituted within the meaning of Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act"). The Internal Committee shall have powers as mentioned under Section 11 of the Act.

The Executive Committee of the Board shall notify the composition of the Committee and any change thereof, from time to time by internal communication.

6.0 REPORTING AND ACTIONS

Any violation / non-adherence of the Policy shall be reported to the Committee.

Complaint should be made only in writing by the aggrieved woman herself and shall contain description of each incident(s). It should include relevant dates, timings and locations; name of the respondent(s); and the working relationship between the parties.

The Committee shall before initiating an inquiry, would take necessary steps to settle the matter through conciliation in terms of Section 10 of the Act. If no settlement is reached within a period of 60 days, the Committee shall initiate inquiry in terms of Section 11 of the Act.

Upon completion of the inquiry, the Committee would submit the Inquiry Report, along with its recommendations to the Managing Director. The Managing Director shall in act upon the report and recommendations within a period of 60 days of its receipt.

However, if the Committee receives a complaint which upon investigation is found to be false, appropriate disciplinary action and / or punishment (including termination of employment) may be imposed against the employee making the false complaint.

7.0 MONITORING AND REVIEW

The Executive Committee of the Board will monitor and review the adequacy of this Policy.

8.0 AMENDMENTS

The Board reserves the right to vary and / or amend the terms of this Policy from time to time at its absolute discretion.

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