



Prevention of Sexual Harassment (POSH) at the Workplace Policy



CONTENTS

1.	OBJECTIVE	5
2.	INTRODUCTION	6
3.	SCOPE/APPLICABILITY	7
4.	DEFINITIONS	7
5.	ROLES AND RESPONSIBILITIES	10
6.	REDRESSAL MECHANISM – FORMAL INTERVENTION	10
7.	INTERNAL COMPLAINTS COMMITTEE (HENCEFORTH KNOWN AS ‘ICC)’	11
8.	COMMITTEE MEMBERS	12
9.	LODGING A COMPLAINT	13
10.	RECEIVING A COMPLAINT (GUIDELINES)	14
11.	RESOLUTION PROCEDURE THROUGH CONCILIATION	15
12.	RESOLUTION PROCEDURE THROUGH FORMAL INQUIRY	15
13.	MANNER AND PROCEDURE OF INQUIRY INTO COMPLAINT	16
14.	AWARENESS	19
15.	LEGAL COMPLIANCE	20
16.	NON-RETALIATION POLICY	20
17.	ANNEXURE A	1
18.	ANNEXURE B	2
19.	APPENDIX C	3

Document Change Log

Version	Review on	Effective from	Purpose of change
v1.1	15 th January 2025	1 st April 2024	Policy revision

Sexual harassment at the workplace results in violation of the fundamental rights of a woman

- To equality under Articles 14 and 15 of the Constitution of India
- To life and to live with dignity under article 21 of the Constitution
- To practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

BPTP LIMITED is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace to all employees without regard to race, caste, religion, color, ancestry, marital status, gender, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving an employee or employees is a grave offence and is therefore, punishable.

This Policy extends to all employees/consultants of BPTP Limited and its subsidiaries and any other company which may be incorporated in future with applicability of BPTP HR policies - hereinafter referred to as 'Company' / 'Group' / 'Organization' in this policy. It is deemed to be incorporated in the service conditions of all employees/consultants/retainers of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

This version of the policy is effective from September 01, 2023 and this Policy shall supersede all prior policies and communication on this matter in the Group.



1. OBJECTIVE

To depose duties as an Employer as follows:

- (i) Formulate, issue and widely disseminate a Policy statement for defining, prohibiting, prevention and redressal of Sexual Harassment at all BPTP Offices
- (ii) Nurture and promote gender sensitive and safe working environment at all BPTP Offices and all BPTP Locations/Projects/Sites and ensure safety from persons coming into contact at such places and remove underlying factors that contribute towards a hostile work environment against women.
- (iii) Promptly, confidentially and sensitively address issues related to Sexual Harassment and laying down the procedures for the resolution, settlement or prosecution of acts of Sexual Harassment.
- (iv) Provide mechanisms for assistance and support for victims of Sexual Harassment
- (v) Display at a prominent place in all BPTP Offices and all BPTP Locations/ Projects/ Sites, the penal consequences of Sexual Harassments, and constitution of the Internal Complaints Committee (defined below), and, names and details of Members of the Internal Committee.
- (vi) Organize workshops and awareness programmes at regular intervals for sensitizing Employees with the Applicable Laws, as per Applicable Laws prescribed by the Appropriate Government.
- (vii) Provide all necessary facilities for the Internal Committee or the Local Committee for dealing with the Complaints.
- (viii) Assist in securing attendance of Respondent and witnesses before the Internal Committee.
- (ix) Make available to the Internal Committee such information as it may require in respect of all Complaints



- (x) Provide assistance to the Aggrieved Woman for filing a Complaint under the IPC or any other Applicable Laws (defined below).
- (xi) Cause to initiate action, under the IPC, or other Applicable Laws, against the Respondent or if the Aggrieved Woman or the Aggrieved Person desires, where the perpetrator is not an Employee, at any of the BPTP Office(s) where the incident of Sexual Harassment took place.
- (xii) Treat all Sexual Harassment cases against Aggrieved Women as misconduct and deal accordingly.
- (xiii) Monitor timely submission of Statutory Reports by the Internal Committee and compliance with disclosure requirements in the Annual Report.
- (xiv) Carry out orientation programs and conduct capacity and skill building programs for all Members as per Applicable Laws prescribed by the Appropriate Government.
- (xv) Carry out Employees awareness programmes and create forum for dialogues which may involve panchayati raj institutions, gram sabha, women's groups, mother's committee, adolescent groups, urban local bodies as exist or may be formed in future and any other bodies as may be considered necessary.

Use modules developed by the Appropriate Government to conduct workshops and awareness programmes for sensitizing the Employees with the provisions of the Prevention of Sexual Harassment Laws.

2. INTRODUCTION

At BPTP, we have zero tolerance for Sexual Harassment, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to:

- Treat each other with dignity and respect;
- Follow the letter and spirit of law;
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature);



- Refrain from creating hostile atmosphere at workplace via sexual harassment; and
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the Company.

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”). This Act is to provide protection against Sexual Harassment of Women at Workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

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 the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

3. SCOPE/APPLICABILITY

This Policy extends to all employees/consultants/retainers of the Company and is deemed to be incorporated in the service conditions of all employees/consultants/retainers of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

4. DEFINITIONS

- **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 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:

- A. 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:

- a. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
- b. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation
- c. Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will
- d. Demand or request for sexual favors
- e. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
- f. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
- g. 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.
- h. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wish
- i. Giving gifts or leaving objects that are sexually suggestive
- j. Even 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
- k. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

B. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- a. Implied or explicit promise of preferential treatment in employment;
- b. Implied or explicit threat of detrimental treatment in employment;
- c. Implied or explicit threat about the present or future employment status;
- d. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- e. 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.

- **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.
- **Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy
- **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy
- **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.
- **Board:** shall mean the relevant board of directors of the relevant Entity of the Group.
- **Appropriate Government:** shall mean the Central Government or the State Government as applicable in relation to a BPTP Office.
- **Applicable Laws:** shall mean all applicable laws in respect of prevention of Sexual Harassment including without limitation the Prevention of Sexual Harassment Laws, the IPC and rules there under, and applicable judicial



precedents.

- **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.
- **Workplace:**
 - Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company.
 - Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.
- **Employer:** A person responsible for management, supervision and control of the workplace.
- **Member:** refers to a member of the Internal Committee appointed as per this Policy for handling the case of Sexual Harassment.

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.



7. INTERNAL COMPLAINTS COMMITTEE (HENCEFORTH KNOWN AS ‘ICC’)”

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (ICC) 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:

- A. Presiding Officer: A woman employed at a senior level in the organization or workplace
- B. 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.
- C. 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.

At least one half of the total members nominated being women.

The committee will be responsible for:

- Appoint representative(s) at all the projects/sites of the Company and these representatives shall participate in meetings of ICC, submit all investigations, complaints to the ICC and maintain records of all complaints and actions taken in a secure manner, for the compliances of this Act at various projects/sites,
- Receive and address complaints of sexual harassment from the Aggrieved Person within the organization and ensure the complaint to be received in writing and,
- Conduct investigations into complaints, ensuring confidentiality and sensitivity,
- Maintain records of all complaints and actions taken in a secure manner,
- Provide assistance and support to the Aggrieved Person to take action for redressal during the complaint process,
- Ensure a timely and impartial inquiry, respecting the principles of natural justice,
- Recommend appropriate actions or remedies to the management upon completion of the inquiry,



- Conduct awareness and training programs on preventing sexual harassment,
- Monitor the implementation of preventive measures and policy compliance,
- Submit an annual report to the management and District Officer regarding the activities and cases handled

8. COMMITTEE MEMBERS

Internal Complaint Committees (“ICC”) have been formulated for all locations / Sites as follows:

- A. Ms. Chitra Menon, Non-Executive Director designated as Presiding officer,
- B. Ms. Jyoti Sangwan, Senior General Manager, Human Resources designated as Internal Member
- C. Mr. Manik Malik, Chief Financial Officer designated as Internal Member
- D. Mr. Ramanand Yadav, Advocate designated as External Member.

While the ICC at corporate level will handle all complaints received in New Delhi, representatives from following locations are co-opted into the ICC to cover the various locations/Sites of BPTP:

- A. Faridabad
- B. Noida
- C. Gurugram

For ICC constitution at the following subsidiaries, members will be coopted from the respective companies to participate in the investigations/POSH related initiatives that are required to be conducted:

- A. BPTP International Trade Centre Limited
- B. BPTP Parklands Pride Limited
- C. Anjali Promoters & Developers Private Limited
- D. Ridgecraft Homes Private Limited
- E. Business Park Maintenance Services Private Limited



The Sites representatives would participate in quarterly meetings of ICC and any investigations /POSH related initiatives that are required to be conducted in their respective Sites/ areas.

The details about the current members of the ICC and nominations from various Locations/Sites and major BPTP Limited subsidiaries & its Group Companies are enclosed in Annexure A.

9. 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 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.

1. 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.
2. 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.
3. 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.
4. 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 POSH@tatapower.com. The complaint can also be physically submitted to any IC member.

10. 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:

- Complaints are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
- Situations are not to be 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.

- All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- 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.

11. 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.

12. RESOLUTION PROCEDURE THROUGH FORMAL INQUIRY

The committee will initiate inquiry in the following cases:

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



13. MANNER AND PROCEDURE OF INQUIRY INTO COMPLAINT

- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- 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.
- 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.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- 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.
- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- 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.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- 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.
- No legal practitioner can represent any party at any stage of the inquiry procedure
- The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice

- In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 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.
- 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.

Interim relief

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

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

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

Termination of Inquiry

The 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.

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.

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.

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.

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.

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.

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.

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.

14. AWARENESS

Awareness sessions are to be organized 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.

- Carry out orientation programs and seminars for the Members of the IC.
- Conduct capacity building and skill building programs for the Members of the IC.
- Declare the names and contact details of all the Members of the IC.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

15. 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:

- Number of complaints of Sexual harassment received in the year
- Number of complaints disposed of during the year
- Number of cases pending for more than 90 days
- Number of workshops or awareness program against Sexual Harassment carried out
- Nature of action taken by the employer or District Officer

16. NON-RETALIATION POLICY

- A. **Non-Retaliation:** The Internal Committee/ Senior Management must be sensitive to the possibility of the Respondent displaying Retaliation behaviour. At all times, the Internal Committee/ Senior Management shall take all necessary steps to prevent Retaliation/ Victimization against the Aggrieved Person/Complainant.
- B. **Privilege to Aggrieved Woman during Enquiry Proceedings.** If the Aggrieved Woman requests in writing, the Internal Committee may recommend the Senior Management to do any of the following, during a pending Enquiry Proceeding:
- a. Transfer the Aggrieved Woman or the Respondent to any other BPTP Location;



- b. Grant leave to the Aggrieved Woman for up to three (3) months. This leave shall be in addition to the leave she is otherwise entitled to; or
- c. Grant other remedy as shall be prescribed by the Appropriate Government from time to time in this regard
- d. Restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her confidential report, and assign the same to any other employee as the Senior Management may deem fit and necessary

A handwritten signature in blue ink, appearing to be 'V. Chidambaram', is written in a cursive style.

17. ANNEXURE A

- A. The following representatives co-opted into the ICC to cover the various locations of BPTP:
- Next Door, Faridabad - Mr. Sumit
 - BPTP Capital City, Noida - Mr. Pawan Pandey
 - Centra One, Gurugram - Ms. Archana
- B. Additionally, ICCs have been constituted for BPTP Limited and Its following subsidiaries and group companies, as follows:
- BPTP International Trade Centre Limited
 - BPTP Parklands Pride Limited
 - Anjali Promoters & Developers Private Limited
 - Ridgecraft Homes Private Limited
 - Business Park Maintenance Services Private Limited
 - Designer Realtors Private Limited



18. ANNEXURE B

Incident Reporting Format

(The Format below are indicative guidelines for filing Complaints and not mandatory. A Complainant may make a Complaint in any other Form)

Incident reporting Format	
Name of the Complainant/ Victim:	
Incident Reported against (Name of the Respondent):	
Date of Reporting	
Incident details:	
What happened?	
Who was involved?	
When did the incident take place?	
How did you get to know this?	
Was it the first time this has occurred, or has it happened previously?	
Any witnesses? If yes, please share their names?	
Is there any other physical evidence or documents of the incident?	
If yes, please attach the document or evidence	
Anything else that you would want to mention?	

(Signature of the Complainant/ Victim)

19. APPENDIX C

Definitions

Term	Definition
Accessibility	The design of products, devices, services, or environments for people with disabilities.
Bystander	Any person who witnesses harassment and is encouraged to intervene or report.
Complainant	Person who reports sexual harassment.
Confidential Information	Any non-public information, proprietary data, trade secrets, and business operations details.
Diversity	The presence of differences in identity, perspective, experience, and background among people.
Designated Persons	Employees and insiders identified under SEBI regulations for compliance with insider trading norms.
ESG	Environmental, Social, and Governance, a set of standards measuring a company's impact and ethical behaviour.
External Member	An independent third-party expert in women's rights, nominated to the ICC.
GRESB	A global ESG benchmark assessing environmental, social, and governance performance of real estate assets, including standing and development projects.
ICC	Internal Complaints Committee formed under the POSH Act to address sexual harassment complaints.
LGBTQ+	A community of people who identify as lesbian, gay, bisexual, transgender, queer, and other gender identities.
MoU	Memorandum of Understanding – a formal agreement executed between BPTP and its CSR implementation partners.
Net Profits	Profits calculated in accordance with Section 198 of the Companies Act, 2013.
POSH Act	The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.
Respondent	Person against whom the complaint is made.
Sensitive Personal Data	Includes financial data, health information, biometric data, etc., as defined by Indian law.

Term	Definition
Sexual Harassment	Any unwelcome act of sexual nature, as defined under the POSH Act, 2013.
Unconscious Bias	Social stereotypes about certain groups of people that individuals form outside their conscious awareness.
UPSI	Unpublished Price Sensitive Information, information that could materially affect the stock price of the Company if made public.
Victimization	Punitive actions or threats against someone for filing a complaint or supporting an inquiry.

20. APPENDIX

Complaint Filing Form

(The given format provides indicative guidelines for filing complaints and is not mandatory.

The complainants can use any other medium or structure of form to report complaints)

INCIDENT REPORTING FORMAT	
Complaint Against	
Date of Reporting	
Date of Incident	
Incident Description	
People Involved	
Any related incidents	
Witness Information	
Evidence	