



**BRMP LEASING & FINANCE PRIVATE LIMITED**

**Policy for Prevention of Sexual Harassment @Workplace**

**Under**

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

## **RECORD OF REVIEW**

<b>BRMP LEASING AND FINANCE PRIVATE LIMITED</b>	
Policy Title	Policy for Prevention of Sexual Harassment
Created By	Compliance & HR Department
Reviewing & Approving Authority	Board of Directors
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## 1. OBJECTIVE

To ensure a safe, secure, and respectful work environment free from sexual harassment for all employees, in accordance with the POSH Act, 2013.

## 2. SCOPE

This policy applies to all employees (permanent, temporary, interns, consultants) at all locations/offices of the organization and workplace-related events (off-site meetings, training, parties, business travel).

## 3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behavior (direct or implied) such as:

- Physical contact and advances
- A demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome conduct of sexual nature

## 4. Internal Complaints Committee (ICC)

An ICC must be constituted with: As per the provisions of the POSH Act, the Company has constituted an **Internal Committee (IC)** to address complaints related to sexual harassment at the workplace.

- Presiding Officer: Senior woman employee
- Two employee members
- One external member from an NGO or with legal background

Sr no.	Name	Role	Email Id	Contact
1	Afroz Akhter (Presiding Officer)	HR AVP	<a href="mailto:afroz.akhtar@brmp.co.in">afroz.akhtar@brmp.co.in</a>	9569964449
2	Adhir Kuntawar (Internal Member)	Company Secretary	<a href="mailto:adhir.kuntawar@brmp.co.in">adhir.kuntawar@brmp.co.in</a>	8007798019
3	Anup Lakhwani (Internal Member)	Finance Manager	<a href="mailto:anup.lakhwani@brmp.co.in">anup.lakhwani@brmp.co.in</a>	8669072319
4	Shivani Raghuvanshi (External member)	External	<a href="mailto:raghuwanshishivani.11@gmail.com">raghuwanshishivani.11@gmail.com</a>	8959691955

**Note: As of now, no women employee is on board. Whenever senior female emp is on boarded, then committee will be reconstituted.**

- **Responsibilities of the Internal Committee:**

1. Receive complaints of sexual harassment at the workplace.
2. Initiate and conduct inquiries as per the established procedure.
3. Submit findings and recommendations of the inquiry.
4. Coordinate with the Company in implementing appropriate action.
5. Maintain strict confidentiality throughout the process in line with guidelines.
6. Submit annual reports in the prescribed format.

## **5. Complaint Mechanism**

An aggrieved person may file a written complaint of sexual harassment with the **Internal Committee (IC)** in the prescribed format. While you may be under emotional stress at the time of filing the complaint, it is important to provide as much specific detail as possible to enable proper inquiry.

### **The complaint should include:**

1. Name of the Respondent, their place of work, and designation.
2. Complete details of the incident(s), explained as clearly as possible. *No detail is irrelevant.*
3. Date(s) of each incident mentioned.
4. Place(s) where the incident(s) occurred.
5. Relief sought from the employer, which may include transferring the Respondent or any other appropriate action.

### **Notes on Complaint Filing**

1. The complaint must be submitted within **three months** from the date of the incident.
  - If there are multiple incidents, the complaint must be filed within three months from the date of the **last incident**.
2. If there is a valid reason for delay, the IC may extend the time for filing the complaint by **up to three additional months**, after recording the reasons in writing.
3. The written complaint must be submitted to the IC along with any supporting documents and, where applicable, names and contact details of witnesses.
4. Supporting material may include relevant emails, SMS/WhatsApp screenshots, call details, photographs, recordings, or any other evidence. Multiple documents in any format may be attached.

## **6. Inquiry and Redressal**

The ICC will conduct an inquiry within 90 days and submit a report within 10 working days. The employer must act on the recommendations within 60 days.

**7. Disciplinary Actions**

May include: Written apology, warning, withholding promotion, termination, or police complaint if needed.

**8. Protection Against Retaliation**

The organization prohibits retaliation against complainants or witnesses. False complaints will also be dealt with after inquiry.

**9. Awareness and Training**

Annual workshops and awareness sessions will be conducted. Policy introduced during induction for new employees.

**10. Record Keeping & Reporting**

The ICC shall maintain records of all complaints, inquiries, findings, and actions taken, and submit an annual report to the employer and the local district officer as per the POSH Act requirements.

**11. Confidentiality**

- All complaints, proceedings, and related information under the POSH Act must be kept **strictly confidential**.
- Information such as the **identity of complainant, respondent, witnesses, complaint details, inquiry proceedings, IC recommendations, and action taken** cannot be shared with public, press, or media.
- Limited disclosure is permitted only to highlight that **justice has been delivered**, without revealing the identity of the complainant or witnesses.
- Purpose: To protect victims, deter others from harassment, and reinforce the employer's **zero-tolerance policy**.
- **Breach of confidentiality** will lead to disciplinary actions.

**\*\*\*End of Policy Document\*\*\***