

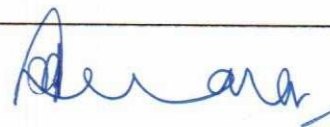
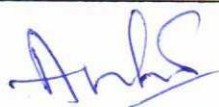
POLICY ON SEXUAL HARASSMENT

BASE EDUCATIONAL SERVICES PVT LTD

Approved by	Chief Executive Officer
Date	1 st September 2024
Version	2.0

Chief Executive Officer



Head - Finance and Corporate Compliance



POLICY ON SEXUAL HARASSMENT

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POLICY ON SEXUAL HARASSMENT

This document sets out the Sexual Harassment Policy of BASE Educational Services Private Limited, a company having its registered office at No. 27, Bull Temple Road, Basavanagudi, Bangalore - 560004 (hereinafter referred to as "Company"). This Policy aims to define sexual harassment, lay out the procedures for filing a complaint of sexual harassment, setting up of an Internal Inquiry Committee and punishment for the offence committed.

1.STATEMENT OF POLICY

It is the goal of the Company to promote a workplace that is free of sexual harassment. Sexual harassment of women occurring in the premises of the Company or other settings in which the women employees may find themselves in connection with their employment is unlawful and will not be tolerated by the Company under any circumstances. Further, any retaliation against any individual who has complained of a sexual harassment or retaliation against individuals for cooperating with a sexual harassment complaint is also unlawful and will not be tolerated by the Company.


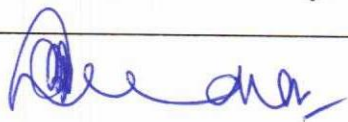
2.DEFINITION OF SEXUAL HARASSMENT

Sexual harassment means and includes any of the following acts committed against an Employee of the Company:

- i. physical contact and advances; or
- ii. A demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Further, the following acts, if they occur along with any act of sexual harassment would also amount to sexual harassment:

- i. implied or explicit promise of preferential treatment in her employment; or
- ii. implied or explicit threat of detrimental treatment in her employment; or

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- iii. implied or explicit threat about her present or future employment status; or
- iv. interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. Humiliating treatment likely to affect her health or safety.
- vi. sending offending message through phone, email or any social media platform


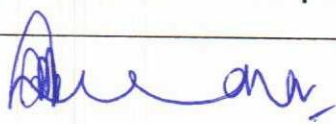
The above-mentioned acts will be deemed acts of sexual harassment if they are carried out anywhere within the premises of the Company or any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.

For the purpose of this Policy the persons committing the acts as mentioned above, may be co-workers, other Employees of the Company or any other person that the Employee comes in contact with, during the course of employment.

3.WORK ATMOSPHERE

The Company takes serious note of any acts of sexual harassment against Employees of the Company. It is therefore the responsibility of the head of each department to establish and maintain a safe work environment for their Employees and take the following steps to ensure that such acts do not occur in their department:

- i. Set a tone for office conduct and appropriate workplace behaviour;
- ii. Communicate to the employees that sexual harassment will not be tolerated. These instructions should not be limited to just the employees of the Company but should also be communicated to such other agencies /organizations which the Employee may come in contact during or in connection with her employment in the Company, this may include but shall not be limited to the transporter engaged in transporting the Employees of the Company, other organizations to which they are deputed, customers and clients of the Company.
- iii. Place a copy of this Policy on the Company notice board or any other such prominent places;

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- iv. To train all the team managers to reduce likelihood of sexual harassment at the Premises of the Company;
- v. Make it known to all employees that any act of sexual harassment will be severely dealt with by the Company. It is further clarified that any of the heads of the departments or authorized representative who do not take corrective/preventive actions with regard to the above shall be personally held liable for incidents of sexual harassment.

4.COMPLAINT PROCEDURE

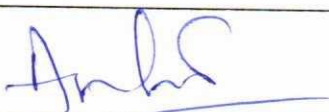
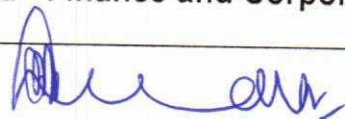
- i. An aggrieved Employee may make a complaint of sexual harassment to the Internal Committee, in writing, within three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of the last incident. Where a complaint cannot be made in writing, one of the members of the Internal Committee shall render all reasonable assistance to the aggrieved Employee for making the complaint in writing.
- ii. Before initiating the inquiry, the Internal Committee may take steps to settle the matter between the Employee and the accused person if requested by the Employee. However, no monetary settlement shall be made as the basis of conciliation

In case a settlement is arrived at in pursuance of such conciliation, the Internal Committee shall record the settlement so arrived at between the parties and will report the same to the Company for recommended action. In such cases, no further inquiry will be conducted by the Internal Committee.

5.COMPLAINTS OF SEXUAL HARASSMENT

If any of the Employees believes that she has been subjected to sexual harassment, such Employee has the right to file a complaint with the internal committee ("the Internal Committee"). The Internal Committee constituted in the Company to which the complaint can be made and which will conduct the inquiry will consist of the Committee members:(Committee member list refer Annexure - A)

If any Employee is desirous of filing a complaint of sexual harassment, she may do so by contacting Chairperson of the Internal Committee. This person will also be available to discuss any concerns of the Employees and to provide them with information on the Company's Policy on sexual harassment and the complaint process.

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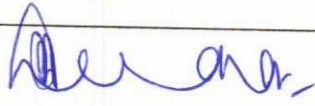
6. INVESTIGATION

- i. In the event that a settlement is not reached through conciliation, the Internal Committee shall proceed to investigate the complaint made. The Internal Committee shall investigate each and every complaint of sexual harassment received from the Employee in a fair and expeditious manner. All such investigations shall be kept confidential except when nature of investigation makes it necessary to disclose certain information.
- ii. Both parties shall, during the course of inquiry, be given an equal opportunity of being heard and a copy of the findings will be made available to both the parties enabling them to make representations before the Internal Committee. The Internal Committee's investigation shall include a private interview with the person who has complained, the person who is alleged to have committed the act of sexual harassment and witnesses, if any.
- iii. After the investigation is completed by the Internal Committee {which might be expeditious and concluded within 90 (ninety) days}, the Internal Committee shall inform the Company, Employee and the person accused of committing sexual harassment the outcome of such investigation.
- iv. In the event that the accused is found guilty of sexual harassment, the Internal Committee shall, based on the findings of the investigation, recommend to the Company the nature of disciplinary action to be taken.
- v. If the allegations of sexual harassment are not proved against the accused, then the Internal Committee shall recommend to the Company that no action need to be taken against the accused.

7. DISCIPLINARY ACTION

If it is determined that an act of sexual harassment has been committed against an Employee and the accused is found guilty of such act, the Internal Committee may recommend any of the following punishments to the guilty :

- Written apology
- Warning
- Reprimand or censure
- Withholding of promotion, pay raise or increment
- Terminating services

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8. ACTS BY OR AGAINST THIRD PARTIES

Where sexual harassment occurs as a result of an act or omission by any third party/client or outsider, during the course of employment of the Employee, the Company will assist such Employee in taking all steps necessary and reasonable to take action against such erring outsiders/third party.


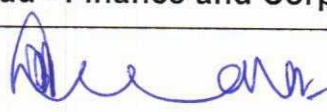
In the event that any employee of the Company is found guilty of any acts of sexual harassment or is convicted under the relevant provisions of criminal law (including without limitation Section 75 of The Bharatiya Nyaya Sanhita 2023: Sexual harassment), the services of such employee may, at the discretion of the Company, be terminated forthwith by the Company.

9. FALSE ACCUSATIONS

Whilst on one hand the Company does not tolerate acts of sexual harassment at its work place, the Company also does not encourage or tolerate any false accusations made by its Employee against the other employee/employees in this regard. Due to the serious and private nature of this offence, false accusations of sexual harassment are, and will be treated as a disciplinary offence and will result in the same level of punishment as that applied to a person who engages in an act of sexual harassment.

However, merely finding an accused employee not guilty of sexual harassment or an Employee's inability to substantiate a complaint with adequate proof shall not imply that a false accusation was made by the Employee or attract disciplinary action, and this clause shall only apply where it is found that the complaint was made mala fide, deliberately, falsely and with the intention of harming the accused as established by an inquiry.

Further, where it comes to the knowledge of the Internal Committee that the Employee or any witness thereof has given false evidence or produced any forged or misleading documents, the Internal Committee shall make a recommendation to the Company to initiate strict action against such Employee.

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EMPLOYEE SEXUAL HARASSMENT- ANNEXURE - A

Policy Name	Policy on Sexual Harassment
Version	2.0
Effective from	1st September 2024

Internal and external committee members list:	
Prof. Y K Jayaramappa	Chairperson
Dr. A V Shivakumara	Member
Dr. Krishna C Poojari	Member
Ms. Lakshmi Murthy	Member
Mr. Sreedhar K	Member
Ms. Uma Venkatesh	Member
Ms. Varsha Singhi	Member
Ms. Divya Ramesh	External Member

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