BEST ROADWAYS LIMITED

Driving India's Freight, Safely.

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

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Classification	Public — applies to all employees and workers at every BRL workplace, including contractors', vendors' and visitors' conduct; copy available to customers, regulators and certifying bodies on request

Best Roadways Limited
Corporate Office: Andheri (East), Mumbai 400 099, Maharashtra, India
Website: www.bestroadways.com

Document Control & Revision History

This Policy is a controlled document. Only the version published on BRL's official document-management portal (or the latest signed hard copy circulated by the HR function) shall be treated as current. Printed copies are uncontrolled unless stamped "Controlled Copy".

Revision History

Version	Date	Prepared By	Summary of Change	Approved By
V1	01-Aug-2026	Head — Human Resources	Initial issue as a standalone controlled document. Codifies BRL's compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules, 2013 — ICC constitution, complaint and inquiry procedure, statutory timelines, interim reliefs and annual reporting — consolidating the ICC provisions referenced in the HSSE Policy (Section 8.3) and DEI Policy (BRL/HR/POL/05).	Board of Directors

Distribution

This Policy applies to and shall be distributed to:

- Corporate Head Office — Andheri (East), Mumbai.
- All BRL branch offices across India (currently 65+ branches).
- Container Freight Station (CFS) and bonded warehouse operations at Nhava Sheva / JNPT (750,000+ sq. ft.).
- All BRL-owned and attached vehicles (800+ commercial vehicles operating across India).
- All contractors, sub-contractors, attached transporters, handling agents, on-site vendors, IT vendors and security agencies.
- All BRL suppliers and business partners — through the contracting process.

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1. Director's Commitment Statement

BRL is committed to a workplace in which every person — in our offices, warehouses, yards, vehicles and at customer sites — works free from sexual harassment, and in which every complaint is heard through a fair, confidential, time-bound statutory process. This commitment is inseparable from our drive to increase women's participation across BRL: participation is only real when the workplace is safe.

Sexual harassment of any kind, by any person, at any BRL workplace, will be addressed under this Policy and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 — without exception and without regard to seniority.

Our four commitments

- Prevention — A respectful culture, visible communication and annual training at every location.
- Access — A duly constituted Internal Complaints Committee that every woman worker — employee, contractor's worker, trainee or visitor — can approach.
- Fair process — Statutory timelines, confidentiality, natural justice for all parties, and protection from retaliation.
- Accountability — Enforcement of recommendations, annual statutory reporting, and Board oversight.

Mr. J. K. Gupta
Founder & Chairman
Best Roadways Limited

Mr. Suyashh Gupta
Director — Strategy, Technology & Sales
Best Roadways Limited

2. Scope, Application & Definitions

2.1 Scope

This Policy applies to all BRL workplaces — the Head Office, every branch, warehouse, yard, workshop, vehicle, and any place visited by a worker arising out of or during employment, including customer sites, transport provided by BRL and off-site events. It protects every woman at a BRL workplace — whether employed by BRL, a contractor or a vendor, and whether permanent, temporary, trainee, apprentice, probationer or visitor — and binds the conduct of every employee, contractor, vendor and visitor. Complaints by any person of any gender regarding harassment shall additionally be addressed under the DEI Policy (BRL/HR/POL/05) and BRL's disciplinary framework.

2.2 What Constitutes Sexual Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication:

- Physical contact and advances;
- A demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature — including via messages, calls, WhatsApp or social media.

The following circumstances, among others, if connected with any such act, may also amount to sexual harassment: implied or explicit promise of preferential treatment or threat of detrimental treatment in employment; threat about present or future employment status; interference with work or creating an intimidating, offensive or hostile work environment; or humiliating treatment likely to affect health or safety.

3. Internal Complaints Committee (ICC)

- An ICC is constituted at the Head Office and at every branch or unit with ten or more workers; district-level Local Committees have jurisdiction for smaller units as provided by the Act.
- Composition — (a) a Presiding Officer who is a woman employed at a senior level at the workplace; (b) not less than two members from amongst employees, preferably committed to the cause of women or with legal knowledge or social-work experience; and (c) one external member from an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment. At least one-half of the members shall be women.
- Tenure — Members hold office for a term not exceeding three years; the current constitution and contact details of each ICC shall be displayed at every workplace and on the BRL intranet.
- Quorum and conduct — The ICC shall conduct proceedings in accordance with the Act and Rules and the principles of natural justice; a member with a conflict in a matter shall recuse.

4. Complaint Procedure & Statutory Timelines

1. Filing — An aggrieved woman may file a written complaint with the ICC within three months of the incident (or the last incident in a series); the ICC may extend this by up to a further three months for reasons recorded in writing. Where she is unable to complain in writing, ICC members shall render all reasonable assistance; where she is unable to complain, her legal heir or such other person as prescribed may do so.
2. Conciliation (optional) — Before inquiry, and only at the request of the aggrieved woman, the ICC may attempt conciliation — provided that no monetary settlement shall be made the basis of conciliation. Any settlement shall be recorded and copies provided to both parties; no further inquiry lies if the settlement is honoured.
3. Inquiry — The ICC shall inquire into the complaint in accordance with principles of natural justice, giving both parties an opportunity of being heard, and shall complete the inquiry within ninety days. Both parties may produce documents and witnesses; neither party may bring in legal practitioners.
4. Report — The ICC shall provide its report of findings to the employer (and the parties) within ten days of completion of the inquiry.
5. Action — Where the allegation is proved, the ICC shall recommend action for sexual harassment as misconduct under BRL's service rules — which may include written apology, warning, withholding of promotion or increment, transfer, termination, counselling or community service — and/or deduction of compensation payable to the aggrieved woman as determined under Section 15 of the Act. The employer shall act upon the recommendation within sixty days.
6. Appeal — Any person aggrieved by the ICC's recommendations or non-implementation may prefer an appeal to the court or tribunal prescribed under the Act within ninety days of the recommendations.

4.1 Interim Reliefs During Inquiry

- On the written request of the aggrieved woman, the ICC may recommend: her transfer or the respondent's transfer to another workplace; leave of up to three months in addition to her entitled leave; restraining the respondent from reporting on her work performance; or such other relief as prescribed.
- Recommended interim reliefs shall be implemented by HR and confirmed to the ICC.

5. Confidentiality, Protection & Malicious Complaints

- Per Section 16 of the Act, the identity of the aggrieved woman, respondent and witnesses, and all inquiry contents, shall not be published or disclosed — except that justice secured may be disseminated without identifying particulars.
- Retaliation against a complainant, witness or ICC member is prohibited and is itself misconduct; the DEI Policy and Whistleblower Policy protections apply in full.

- Where the ICC concludes a complaint was made, or false evidence produced, knowing it to be false or malicious, it may recommend action against the person concerned — provided that inability to substantiate a complaint, or absence of adequate proof, shall never by itself attract action.

6. Prevention, Training & Employer Duties

- BRL shall display at every workplace the penal consequences of sexual harassment and the constitution of the ICC, in English and the local language.
- All employees shall complete POSH awareness training at induction and annually; ICC members shall receive specialised training; contractor supervisors and security agencies shall be sensitised to this Policy.
- Site design and rosters shall consider safety — lighting, CCTV, secure washrooms and safe transport for late shifts — per the DEI and HSSE Policies.
- BRL shall provide the ICC the facilities and assistance required, secure attendance of respondents and witnesses, and make available information relating to complaints.
- HR shall include the statutorily required information on POSH complaints in BRL's annual report filings, and each ICC shall submit its Annual Report to the employer and District Officer as required by the Act.

7. Roles & Effective Date

Role	Responsibility
Board of Directors	Approve this Policy; review annual POSH reporting and compliance.
Director — Strategy, Technology & Sales (Sponsor)	Sponsor a harassment-free workplace as part of the DEI and ESG agenda; ensure ICC recommendations are enforced without regard to seniority.
Head — Human Resources (Document Owner)	Maintain this Policy; constitute and support ICCs at all applicable locations; implement interim reliefs and recommendations within statutory timelines; deliver training; make statutory filings.
ICC (each workplace)	Receive and inquire into complaints per the Act; recommend interim reliefs and actions; maintain confidentiality; submit the Annual Report.
Branch Heads & Warehouse Managers	Display statutory notices; enable access to the ICC; ensure site-safety measures; never suppress or informally settle a complaint outside this Policy.
Every Employee, Contractor and Visitor	Maintain respectful conduct; complete training; cooperate truthfully with ICC proceedings.

This Prevention of Sexual Harassment (POSH) Policy is effective from 01 August 2026. It has been approved by the Board of Directors of Best Roadways Limited.

Mr. J. K. Gupta
Founder & Chairman
Date: _____

Mr. Suyashh Gupta
Director — Strategy, Technology & Sales
Date: _____

Head — Human Resources
Document Owner
Date: _____

— END OF POLICY —