

<b>Subject: Policy on Prevention, Prohibition, and Redressal of Sexual Harassment at Workplace</b>	<b>Policy Ref. No. III-4</b>	<b>Issue Date: 01.10.2024</b>	<b>First Review Date</b> 01.10.2025 <b>Next Review Date:</b> 30.09.2028
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### III- 4.1 OBJECTIVE

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Imperial Auto Industries Limited is committed to provide a harassment free Workplace. This policy has been framed, in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 to provide safe & pleasant work environment where everyone is treated with fairness and respect.

### III – 4.2 APPLICABILITY

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- This policy extends to all employees including individuals coming to the Workplace for employment or for any other purpose whatsoever including but not limited to business partners, visitors, vendors, contractual resources, secondees and applies to any alleged act of Sexual Harassment against persons at Workplace, whether the incident has occurred during or beyond office.
- This policy extends to the Company, its subsidiaries and all employees.

### III – 4.3 IMPORTANT DEFINITIONS

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- (a) **“Act”** means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 of India.
- (b) **“Aggrieved Individual”** means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.
- (c) **“Complainant”** is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging sexual harassment under this policy.
- (d) **“Company”** means Imperial Auto Industries Limited and its subsidiaries.
- (e) **“Core Internal Complaints Committee”** means and include a Core Internal Complaints Committee (hereinafter referred to as the **“CICC”**).
- (f) **“Divisional Internal Complaints Committee”** means and include a Divisional Internal Complaints Committee (hereinafter referred to as the **“DICC”**).
- (g) **“Employee”** as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (h) **“Employer”** means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees.
- (i) **“Member”** means a member of the Core Internal Complaints Committee or Divisional Internal Complaints Committee (as the case may be).
- (j) **“Presiding Officer”** means the presiding officer of the Core Internal Complaints Committee or Divisional Internal Complaints Committee (as the case may be) and shall be a woman employed at a senior level at the workplace amongst the employees.
- (k) **“Rules”** means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.
- (l) **“Respondent”** means a person against whom a complaint of alleging sexual harassment has been made under this policy.
- (m) **“Parties”** means collectively the complainant and the respondent.
- (n) **“Sexual Harassment”** includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):
- Unwelcome sexual advances, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature.
  - Any unwanted physical contact or conduct of any kind, including physical contact, advances or preposition.
  - Any form of communication, whether explicit or implicit, that involves a request or demand for sexual favors -whether conveyed through words or actions-as a condition for employment, career advancement, promotion, transfer, performance appraisal, compensation, or fulfilling business interests with vendors,

customers, or other visitors, is strictly prohibited. Such behavior, which creates a hostile environment, will not be tolerated under any circumstances.

- Granting employment opportunities or benefits to one employee over another as a result of submission to or rejection of sexual advances.
- Verbal harassment of a sexual nature, such as lewd comments, jokes, SMS, e-mails or any other references and offensive personal references.
- Demeaning, insulting, intimidating or suggestive comments (oral or written) about an individual's personal appearance or electronically transmitted messages.
- Displaying sexually suggestive objects, pictures, cartoons, displaying body part.

(n) **“Workplace”** means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

### III – 4.4 INTERNAL COMPLAINTS COMMITTEE

Company has instituted an appropriate mechanism in the form of “Internal Complaints Committee” comprising of at least half of women for redressal of Sexual Harassment complaint by the Complainant. Two types of Internal Complaints Committee will be formed at different levels of Company’s business operations Core Internal Complaints Committee and Divisional Internal Complaints Committee.

(a) **CICC** shall be instituted at corporate office at Faridabad, Haryana which shall be responsible for all Workplace at Haryana Core Internal Complaints Committee shall comprising of -

- **One Presiding Officer** - Shall be woman employed at a senior level at Workplace amongst the employees.
- **Two Member** - Shall be amongst employees preferably committed to the cause of woman or who have an experience in social work or have legal knowledge.
- **One Member**- amongst Non-Governmental Organizations or associations committed to cause of woman or a person familiar with the issues relating to Sexual Harassment.

The present composition of **CICC** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Tanuja	tanuja@impauto.com	+91 8588857972
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Divya Kumari	divyakumari@impauto.com	+91 9220525499

Details of the Members, including their names and contact information, of the CICC are displayed at office notice board and will be updated on a periodic basis, as and when applicable. The Presiding Officer shall have casting vote in case of deadlock. Email ID of CICC is **posh@impauto.com**.

(b) **DICC** shall be instituted at North, West and South Zones which shall be responsible for (Uttar Pradesh , Uttarakhand & Jharkhand), (Gujarat , Madhya Pradesh & Maharashtra), (Tamil Nadu & Karnataka) respectively. Divisional Internal Complaints Committee shall comprising of :

- **One Presiding Officer** - Shall be woman employed at a senior level at Workplace amongst the employees.
- **Two Member** - Shall be amongst employees preferably committed to the cause of woman or who have an experience in social work or have legal knowledge.
- **One Member**- amongst Non-Governmental Organizations or associations committed to cause of woman or a person familiar with the issues relating to Sexual Harassment.

Details of the Members, including their names and contact information, of the DICC are displayed at office notice board and will be updated on a periodic basis, as and when applicable. The Presiding Officer shall have casting vote in case of deadlock.

The present composition of **DICC (North)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Pooja Bisht	poojabisht@impauto.com	+91 7505559553
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Laxmi Srivastava	laxmisrivastava@impauto.com	+91 9198495096

Email ID of DICC (North) is [poshnorth@impauto.com](mailto:poshnorth@impauto.com).

The present composition of **DICC (West)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Varsha Patil	varshapatil@impauto.com	+91 9860895370
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Agni Patidar	NA	+91 9826737707

Email ID of DICC (West) is [poshwest@impauto.com](mailto:poshwest@impauto.com).

The present composition of **DICC (South)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Tanya Chandran	Tanya@impauto.com	+91 8884418441
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Kanimozhi	hrchennai@impauto.com	+91 9952182329

Email ID of DICC (South) is [poshsouth@impauto.com](mailto:poshsouth@impauto.com)

The present composition of **DICC (S J Rubber)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Durgesh Singh	durgesh@sjrindustries.com	+918076352009
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Ritika Mehndiratta	ritika@sjrindustries.com	+918076336854

Email ID of DICC (S J Rubber) is [POSHSJ@sjrindustries.com](mailto:POSHSJ@sjrindustries.com).

The present composition of **DICC (IAI Industries Limited)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Vinita Lende	Purcons.pune@iai.co.in	+91 9326176420
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177
4	Member	Sweta Pandit	shwetapandit@iai.co.in	+91 9371122138

Email ID of DICC (IAI Industries Limited) is [Poshiai@iai.co.in](mailto:Poshiai@iai.co.in)

The present composition of **DICC (Imperial Martor Engine Tubes Private Limited)** is provided as under:

S. No	Constitution	Name	E-Mail ID	Contact No.
1	Presiding Officer	Seema Pawar	seemapawar@imperialmartor.com	+91 9075308996
2	Independent Member	Meena Khanna	meena2206@gmail.com	+91 9873021674
3	Member	Amit Walia	amitwalia@impauto.com	+91 9871030177

Email ID of DICC (Imperial Martor Engine Tubes Private Limited) is [POSHIM@imperialmartor.com](mailto:POSHIM@imperialmartor.com)

#### **Responsibilities of CICC & DICC**

- a) Receive and address Complaints of Sexual Harassment and inquire into Complaints in detail
- b) Assist Complainant in filing the Complaint, in case the Complainant is unable to do so.
- c) Follow the principles of natural justice and treat the Complainant, Respondent, witnesses and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions.
- d) Act without any prejudice or bias.
- e) Make efforts to ensure that the Complainants and the witnesses are not further victimized or discriminated against while the Complaint is pending.
- f) Recuse themselves from their assigned job for the purpose of conducting an Inquiry if there is conflict of interest or a bias coming in the way of conducting a fair Inquiry.
- g) Submission of inquiry report with recommendations to the Employer and copy to be served to both Parties.

#### **III – 4.5 TENURE AND WORKING**

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The CICC & DICC shall hold office for period not exceeding 3 years from the date of nomination. The CICC & DICC Members will regularly meet at the end of every six months for the purpose of implementation of the policy and monitoring the progress done till date.

#### **III – 4.6 ANNUAL RETURN**

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The CICC shall prepare an annual report with following details and shall submit the same to the Company to include in its Annual Report.

- Number of complains is of Sexual Harassment received during the year.
- Number of complaints disposed off 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 Company.

#### **III – 4.7 PROCEDURE FOR FILING COMPLAINT**

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- Aggrieved Individual shall submit six copies of the Complaint accompanied by available supporting documents, texts, calls, emails and relevant details concerning the alleged act of Sexual Harassment(s) including names and address of witnesses, if any which the Aggrieved Individual believes to be true and accurate.
- Where the Aggrieved Individual is unable to make a Compliant on account of their physical incapacity, a compliant may be filed by, relative or friend or a co-worker, or an officer of the National Commission for women or State Women's Commission; or any person who has knowledge of the incident, with the written consent of the Aggrieved Individual.
- On receipt of Complaint, the CICC or DICC (as may be applicable) shall decide the place and time for hearing the Complaint and shall intimate the same to Complainant and Respondent.
- A Compliant should be filed within 3 months of occurrence of last incident.
- CICC or DICC (as may be applicable) may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further 3 months, if it is satisfied that Bonafide circumstances prevented the aggrieved individual from filing complaint within the time limit mentioned in point hereinabove.
- The Complaint should clearly mention name and available details of both the Aggrieved Individual and the Respondent. Anonymous or pseudonymous complaints will not be investigated.

#### **III – 4.8 CONCILLATION**

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Before the CICC or DICC (as may be applicable) initiates an inquiry, the Complainant may request, to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the CICC or DICC (as may be applicable) shall record the same and forward the same to the Employer and provide copies of the settlement to the Aggrieved Individual and the Respondent. In such cases, no further inquiry shall be conducted.

### III – 4.9 INVESTIGATION

- In case where a settlement is not feasible or could not be arrived at through conciliation (ref clause 4.8 above), CICC or DICC (as may be applicable) will conduct an inquiry into the Complaint. Additionally, an inquiry may also be initiated if the Aggrieved Individual informs the CICC or DICC (as may be applicable) that any terms of settlement has not been complied with by the Respondent.
- CICC or DICC (as may be applicable) shall investigate in detail the matter of the Complaint. It shall have the right to call the person against whom the Complaint is made or any other witnesses as and when necessary.
- Both the Complainant and the Respondent on date(s) intimated to them in advance shall be heard.
- CICC or DICC (as may be applicable) shall have the right to terminate the enquiry or give an ex-parte decision on the Complaint, if the Respondent or Complainant remains absent for 3 consecutive hearings, without sufficient cause.
- The Parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings.
- For conducting the enquiry, the quorum of the CICC or DICC (as may be applicable) shall include 75% of the total Members including the Presiding Officer.

### III – 4.10 FALSE ACCUSATIONS

- There shall be zero tolerance for any false accusation.
- If the CICC or DICC (as may be applicable) concludes that the allegation was made with malicious intent or forged or misleading documents, then it may recommend action to be taken against the Complainant.

### III – 4.11 TIMELINES

Steps	Procedure/Action	Timelines
1	Submission of written complaint	3 months from date of incident.
2	Complaint copy - sent to Respondent	Within 7 days from receipt of written Complaint
3	Respondent to file reply	Within 10 days of receipt of copy of Complaint
4	Inquiry to be completed	Within 90 days from date of the written Complaint
5	Submission of Inquiry Report	Within 10 days of completion of inquiry
6	Employer to take action	Within 30 days from receipt of the report.

### III – 4.12 MANNER OF TAKING ACTION

If an employee is found guilty of Sexual Harassment, then the following disciplinary action will be taken:

- Written apology, warning, reprimand, or censure transfer.
- Withholding of one or more increments for a period not exceeding one year.
- Suspension / Dismissal from service, Compulsory retirement.
- Training or counselling.

### III – 4.13 PROHIBITION ON DISCLOSURE OF INFORMATION

This policy and the law prohibits any person including CICC or DICC Members (as may be applicable) from publishing, communicating or making known to the public, press and media in any manner, contents of the Complaint, the identity and addresses of the Aggrieved Individual, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the CICC or DICC (as may be applicable) during the proceedings under the provisions of the Act.

### III – 4.14 PROTECTION OF COMPLAINANT

The Company is committed to ensuring that no Employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of Sexual Harassment.

### III – 4.15 APPEAL

Any person aggrieved by the recommendation of CICC or DICC (as may be applicable) may prefer an appeal under the relevant provisions of the Act and Rules.

**III – 4.16 THIRD PARTY SEXUAL HARASSMENT**

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If the Respondent or Aggrieved Individual is a third party, CICC or DICC (as may be applicable) may recommend any one or more of the following:

- Warning to employing organization/association/firm (if any);
- Declaring the Workplace out of bounds to the Respondent;
- Withdrawal of the right to provide services to organization for a certain period (if applicable);
- Helping the Complainant in filing an FIR, should they desire;
- Debarring/blacklisting such person from Workplace;
- Other similar or appropriate punishment.