

# PORWAL AUTO COMPONENTS LIMITED

## Policy on Prevention of Sexual Harassment (Posh) of Women at Workplace

### 1. Introduction

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”). 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. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

#### **The objective of this policy is to:**

- Protect, prohibit, and redress sexual harassment at workplace by defining sexual harassment.
- Provide effective complaint redressal mechanism if there is an occurrence of sexual harassment.
- Provide guidance on education and communication around sexual harassment at workplace.

Each employee is expected to go through the policy, understand the obligations and take ownership of creating a work environment that is inclusive, safe, and respectful of everyone.

This policy is applicable to all employees, irrespective of their nature of association with the Company, across all units and offices in India. Employees include persons:

- On-rolls of the Company, including management & non-management cadre.
- Who are working on temporary or part time or honorary basis, by whatever name called.
- Engaged on a casual basis or for project-based assignments, gig association.
- Engaged through any third-party service providers.

#### **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 a Nestlé India Limited employee and someone that employee deals with in 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):

- 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:

- i. Physical contact and advances;
- ii. Demand or request for sexual favors;
- iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- viii. Persistent watching, following, contacting of a person; and
- ix. 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:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of detrimental treatment in employment;
- Implied or explicit threat about the present or future employment status;
- Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her health or safety.

The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. 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.

**2. 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 and includes contractual, temporary, visitors.

**3. Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman

**4. 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 by any other such name.

**5. Workplace:** In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Porwal Auto Components Limited, including transportation provided for undertaking such a journey.

6. **Employer:** A person responsible for management, supervision and control of the workplace

## 2. POSH COMMITTEE:

Porwal Auto Components Limited has set up Internal Complaints Committees (ICC(s)) to redress complaints on sexualharassment. Each ICC will comprise of:-

- A senior lady employee as the presiding officer.
- The other 3 members will be one female member, one male member and an NGO representativefamiliar with the issue of sexual harassment.

S. NO	NAME	DESIGNATION
1.	Ms. Pragati Baghel	Presiding Officer
2.	Mr. Girdhari Tirole	ICMember
3.	Mr. Shailesh Jain	ICmember
4.	Mrs. Shalu Anand	External Member

3.

## 4. DISCIPLINARY ACTION:

Any employee is found guilty of sexual harassment; appropriate disciplinary action against the said employee shall be taken. The action may include any one or more of the following:

- Warning
- Monetary fine
- Loss of promotion and/or stoppage of increment
- Transfer
- Termination of service

In case the ICC feels the need to transfer the complainant during the investigation to any other locations as a result of the incident, the Company shall assist in such transfer.

If the ICC finds the allegations to be wilfully false, fabricated with malicious intentions, appropriate disciplinary action will be taken against the complainant.

**Annual Update:** Every Business Internal Committee, at the end of calendar year, will prepare an annual report and submit the same to the Management Team and the District Officer. The annual report will include the number of cases filed, if any, and their disposal. It will also be presented in the Annual Report.