

**POLICY ON PREVENTION AND
REDRESSAL OF SEXUAL HARASSMENT
OF WOMEN AT WORKPLACE**

IMPERIAL AUTO INDUSTRIES LIMITED

CIN:U74899DL1975PLC007737

202, KUSHAL BAZAR, 32-33, NEHRU PLACE, NEW DELHI-110019

Table of Contents

1. TITLE.....	3
2. OBJECTIVE.....	3
3. SCOPE AND APPLICABILITY.....	4
4. DEFINITIONS & ABBREVIATIONS.....	5
5. CONSTITUTION OF ICC & PROCEEDURE.....	6
5.1 Constitution of ICC.....	6
5.2 Quorum for proceedings.....	6
5.3 Procedure to be adopted by ICC for adjudication into Complaint.....	6
5.4 Conciliation Process.....	7
5.5 Enquiry into the Complaint.....	8
5.6 Punishment for malicious initiation/reporting/submission of complaint.....	10
5.7 Non-Disclosure of Enquiry proceedings & RTI.....	10
5.8 Appeal.....	11
5.9 Miscellaneous.....	11
5.10 Confidentiality.....	11
5.11 Access to Reports and Documents.....	11
5.12 Protection to Complainant/victim.....	11
6. ANNUAL REPORT.....	12
7. FAQs RELATED TO THE POLICY.....	12



1. TITLE

Policy on Prevention and Redressal of Sexual Harassment of Women at Workplace.

Originally framed on 05th December, 2014

First Revision on 16th December, 2016 (Re-constitution of ICC)

Revised on 01st July, 2018 (Re-constitution of ICC and Revision in Policy)

2. OBJECTIVE

- 2.1 IMPERIAL AUTO INDUSTRIES LIMITED (hereinafter referred to as “Company”) is an equal employment opportunity Company and is committed to creating a healthy working environment that enables employees and women employees in particular, to work without fear of prejudice, gender bias and sexual harassment.
- 2.2 The Company is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.
- 2.3 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, (hereinafter referred to as “Act”) 2013 came into force and which is a Legislative Act in India that seeks to protect women from sexual harassment at their place of work.
- 2.4 Sexual Harassment is not acceptable in the Company pertaining to any work related context which includes, but is not limited to, meetings, conferences, work functions, training events, business trips, work related social events (inside and outside work hours) and interactions with channel partners and/or vendors.
- 2.5 An employee who may be found, to be engaged, in commission of sexual harassment against women at workplace may be held individually liable as per the Act along with any further statutory action resulting therefrom.
- 2.6 The Company has a Policy on Prevention of sexual harassment against women at workplace, which is also in consonance with the Imperial Auto Industries Limited’s Code of Conduct & Ethics.
- 2.7 The Company has preferred to revise the Policy to make it more elaborative and hence the policy version.



3. SCOPE AND APPLICABILITY

- 3.1 This Policy is applicable to all the employees of the Company including management and workmen, temporaries, trainees and employees on contract at the work place of the Company and/or at all the Offices, Plants, subsidiaries of the Company, whether existing or prospective.
- 3.2 The employee for the purpose of this Policy shall mean any person employed with the company for any work, regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the company, 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 co-worker, a contract worker, consultant, probationer, trainee, apprentice or called by any such other name. It also includes any woman who visits the premises of the Company even if not employed with the Company.
- 3.3 This Policy shall also be applicable to all the new group companies, subsidiaries and affiliates, which may be incorporated in future.
- 3.4 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect from the effective date of the present policy.
- 3.5 Sexual harassment would mean and include any of the following:
- 3.5.1 Sexual harassment includes any one or more of the following unwelcome acts or behaviours, committed at the Workplace of the Company (whether directly or by implication) namely:.
- 3.5.1.1 Physical contact and advances; or
- 3.5.1.2 A demand or request for sexual favours; or
- 3.5.1.3 Making sexually coloured remarks; or
- 3.5.1.4 Showing pornography; or
- 3.5.1.5 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- 3.5.2 The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviours of sexual harassment may amount to sexual harassment:
- 3.5.2.1 Implied or explicit promise of preferential treatment in employment of woman employee; or



