



## 1) PURPOSE

- a) Uniparts Group is strongly committed for a workplace that ensures Equal Employment Opportunity and a congenial environment where employees can work without any inhibition.
- b) As part of its equality policy, the company is committed to promoting a good and harmonious working environment where each employee is treated with respect and dignity. No one should feel threatened, intimidated or degraded on grounds of race, color, nationality, ethnic or national origin, sex, married status, sexual orientation, disability, physical characteristics, health, medical condition or religion or belief.
- c) In order to achieve these objectives, the Organization shall endeavor to provide a safe and congenial environment where employees can work without any inhibition and contribute their best without fear and favor.
- d) Uniparts Group recognizes that sexual harassment violates fundamental rights of gender equality, right to life and liberty and right to work with dignity as guaranteed by the Constitution of India and hence provision of a mechanism to redress grievances relating to sexual harassment at the workplace and to protect & enforce the right to gender equality.

## 2) APPLICABILITY

- This policy applies to all employees (permanent, temporary, contractual, casual, trainees/apprentices) of Uniparts India Ltd and its subsidiary in India, including the applicants coming to the organization for employment or to any visitors to the establishment, with Uniparts group. "Employee" means any person on the rolls of the Company, including those on deputation, contract, and are temporary, trainee, casual, part time or working as consultants.
- This applies to all types of harassment in the organization's premises, at organization sponsored social events or work related activities on organization premises and in any setting that relates to work relationships.
- This Policy applies even to a person who would be visiting the company's workplace and who may not necessarily be employed at the company's workplace.
- This policy applies to men and women; to similar and opposite gender relationships; to relationships between supervisors and subordinates; and peer relationships. The employees, customers, vendors, consultants, and anyone else doing business on premises, as well as those involved in activities in which our name is associated, shall comply with this policy.

Effective From January 1 <sup>st</sup> 2014	HRPM/Policy No.../Version...../Rev no.001
Controlled by : Group CPO	Approved by : Managing Director





### 3) SEXUAL HARASSMENT:

"Sexual Harassment" amounts to misconduct in employment and the service rules / regulations governing employment. This includes but not limited to;

- a) Physical contact and advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
- f) Inappropriate electronic mail or SMS text messages, screen savers
- g) Forcible physical touch or molestation
- h) Demands or Request for sexual favors, either explicitly or implicitly, in return for employment, preferential treatment in employment, promotion, examination or evaluation of a person towards any company activity or persistent demands for out of work social activities or humiliating treatment likely to affect his/her health or safety.
- i) Implied or explicit threat about his/her present or future employment status, on the grounds of sexual harassment.
- j) Any unwelcome or uncalled for remarks or insinuation, involving verbal, non-verbal, about a person's sexual activities or private life
- k) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy
- l) Offensive or demeaning comments, questions, jokes and innuendoes & taunts
- m) Gender based insults or sexist remarks
- n) Possession and/or display of erotic or sexually graphic material including posters, photographs, reading matter, objects, pictures, calendars, cartoons, graffiti or messages left on boards or desks.
- o) Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile and intimidating to a person belonging to the other sex or the same sex, on the ground of sex.

### 4) PROCEDURE

Towards the above objective, all measures will be taken to avoid, eliminate, prevent and, if necessary, initiate action for any act of sexual harassments.

#### 4.1 CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC):

An ICC to be constituted by the Board of Directors of the Company, which shall comprise of –

- a) A senior level woman employed at the workplace shall be the Presiding Officer.
- b) Not less than two members from amongst the employees preferably committed to the cause of employee's safety or who have experience in social work or have legal knowledge.
- c) One member from a non-governmental organizations (NGOs) or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least one-half of the total members of the ICC shall be women. The Presiding and other members shall hold office for such period, not exceeding three years, from the date of their nomination.

Effective From January 1 <sup>st</sup> 2014	HRPM/Policy No.../Version...../Rev no.001
Controlled by : Group CPO	Approved by : Managing Director





The Board of Directors of the Company, at its meeting held on 29.11.2013, has constituted the ICC, comprising the following members:

Name	Role
Ms. Rini S Kalra	Presiding Officer
Mr. Sanjay Verma	Member
Mr. Rajiv Puri	Member
Mrs. Sonya Sharma	Member
Outside Independent Member	To be appointed by the Board

#### 4.2 MANNER OF INQUIRY

Any employee who has either in his/her knowledge of and/or who experienced/ is aggrieved, either directly or indirectly, any instances of sexual harassment, shall report, through e-mail or letter duly signed, to the presiding officer of the Committee. Upon receipt of such complaints, the Committee will:

1. Investigate the complaint promptly and thoroughly in a time-bound manner in accordance with principles of natural justice and a detailed report should be maintained.
2. If the Complainant or the respondent, against whom complaint is made, desires any witness(es) to be called, he/she shall communicate in writing to the Committee the names of witness(es) whom he/she propose to call.
3. The Committee shall call upon the Complainant, the Respondent and witness(es) mentioned by both the parties. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom the complaint is made, for putting forward and defending their respective case.
4. If need be, take interim actions against the offenders pending full investigation.
5. Provide assistance to the aggrieved, if he/she so chooses, to file a complaint and cause to initiate action under Indian Penal Code or any other law in force against perpetrator.
6. The committee shall maintain a Register of Complaints, keeping a track of complaints received, when the process began, procedure followed and date of closure and shall ensure timely submission of annual reports to the Board and the Competent Government Authority, as per The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act 2013 .

#### 4.3 ACTION TO BE TAKEN BY ICC

Where allegation is proved, the committee may recommend action in accordance with the service rules of the Company, including but not limited to, a written apology, warning, reprimand or censure, withholding of promotion, pay rise or increments, termination of service, undergoing a counseling session or carrying out community service.

Effective From January 1 <sup>st</sup> 2014	HRPM/Policy No.../Version..../Rev no.001
Controlled by : Group CPO	Approved by : Managing Director





Apart from this the committee may also recommend to deduct from the respondent's salary or wages and recommend payment of compensation to the aggrieved person or his/her legal heirs, which sum shall have regard to –

- a. Mental trauma, pain, suffering and emotional distress caused to aggrieved person,
- b. Loss in career opportunity due to the incident,
- c. Medical expenses incurred by victim for physical or psychiatric treatment,
- d. Income and financial status of the respondent.

#### 4.4 AWARENESS OF EMPLOYEES ABOUT THIS POLICY:

1. This policy shall be displayed prominently in our Portal, office premises accessible by the employees and shall be ensured that all employees are aware of the same.
2. This policy shall be shared with all new joiners' during induction programs.
3. Regular workshop and training programs shall be organized in the units/work place for awareness of the employees on this policy.
4. Company has created a designated e-mail id: "[workplace.harassment@unipartsgroup.com](mailto:workplace.harassment@unipartsgroup.com)", to be accessed by the Presiding Officer of the Committee. Any employee can make Complaints under the policy to the presiding officer of the Committee, through this e-mail Id.

#### 4.5. PROTECTION OF EMPLOYEES DURING INQUIRY PROCEEDINGS:

It is assured that the complainant will not be subjected to retaliation or punishment in any way for complaining, unless the complaints are of the nature mentioned in clause 5. Taking the appropriate disciplinary action is a clear sign that such behavior will not be tolerated. At the same time, the Committee should make sure not to unjustly punish the errant. Disciplinary actions may include an oral warning, reassignment or even termination. All such complaints will be taken seriously and investigations will be carried out thoroughly and discreetly. Both sides will be considered and suitable action will be taken against proven violators and false accusers. This essentially means that no improper action will be taken against someone until a thorough investigation is conducted.

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps, necessary and reasonable, to assist the affected person in terms of support and preventive action. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

During the pendency of inquiry, on a request by the victim, the committee may recommend to – (a) transfer the victim or respondent to any other workplace, or (b) grant leave to the victim for such period, not exceeding three months, as may be decided by the ICC. The leave granted to the victim herein shall be in addition to the leave she would be otherwise entitled. On a written request of the aggrieved person, the committee may restrain the respondent from reporting on/ supervising the work performance or confidential report of aggrieved person and assign same to another officer. Parties shall not be allowed to bring any legal practitioner to represent them in the proceedings before the committee.

Effective From January 1 <sup>st</sup> 2014	HRPM/Policy No.../Version..../Rev no.001
Controlled by : Group CPO	Approved by : Managing Director





HR POLICY MANUAL  
DISCRIMINATION FREE WORKPLACE POLICY AND SEXUAL HARASSMENT POLICY

5) FALSE COMPLAINTS

This policy shall not be used to bring forth frivolous or malicious charges against fellow employees. Disciplinary action under appropriate policy concerning personal misconduct shall be taken against any person bringing a charge of any Harassment **in bad faith**.

6) CONFIDENTIALITY

The identity and addresses of the aggrieved person, respondent and witnesses, information relating to complaint or recommendations of committee shall not be published, communicated or made known to the public, press or media. However, the information may be disseminated regarding the justice secured to any victim of sexual harassment (without disclosing the name, address, identity or any particulars leading to the identification of the victim or witness).

7) FALSE EVIDENCE:

If the committee comes to the conclusion that during the inquiry any witness has given false evidence or misleading document, it may recommend to the employer or the competent Government Authority (as the case may be), to take suitable actions as per the service rules.

8) CONCILIATION:

The ICC can take steps to settle the matter between the aggrieved person and the respondent. This option will be used only at the request of the aggrieved person. No monetary settlement shall be made as a basis of conciliation.

9) APPEALS:

In case the victim, or respondent aggrieved by the recommendation of the Committee, the complaint can be escalated to the Managing Director of the Company, and if the complaint is still unresolved, they may take recourse to the appellate authorities prescribed under the Sexual Harassments of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013, within 90 days.

Effective From January 1 <sup>st</sup> 2014	HRPM/Policy No.../Version...../Rev no.001
Controlled by : Group CPO	Approved by : Managing Director