



PPAP AUTOMOTIVE LIMITED

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT

PPAP Automotive Limited ("PPAP" or "Company") is committed to provide a work environment that ensures every woman associate is treated with dignity and respect and afforded equitable treatment.

PPAP is also committed to promote a work environment that is conducive to the professional growth of its women associates and encourages equality of opportunity.

The Company does not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women associates are not subjected to any form of harassment.

II. SCOPE

The policy applies to all categories of associates of the Company, including permanent management and workmen, temporaries, trainees and associates on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associate.

The workplace includes

1. All Manufacturing Plants, offices or other premises where the PPAP's business is conducted.
2. All Company related activities performed at any other site away from the Company's premises.
3. Any Social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- a) Physical contact and advances;
- b) A demand or request for sexual favours;
- c) Sexually coloured remarks;
- d) Showing pornography; and
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All associates of the Company have a personal responsibility to ensure that their behaviour are not contrary to this policy.

All associates are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINTS MECHANISM

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. COMPLAINTS REDRESSAL COMMITTEE

The Company has constituted Internal Complaints Committee ("ICC") at each location for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The ICC at each location comprises of:

- Presiding Officer: A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members is women

Current nominated members of ICC are given in Annexure-I.

The ICC is responsible for:

- a) Investigating every formal written complaint of sexual harassment.
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- c) Discouraging and preventing employment related sexual harassment.
- d) Recommending modifications / changes in the policy to the Top Management.]

VII. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The Company is committed to provide a supportive environment in which to resolve concerns of sexual harassment as under:

A) Informal Resolution Options

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.

2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the ICC for redressal of her grievances. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B) Complaints

1. Any associate with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of ICC constituted by the Management. The Complaint shall have to be in writing and can be in form of a letter, preferably within **15 days from the date of occurrence** of the alleged incident, sent in a sealed envelope. Alternately, the associate can send complaint through an email. The associate is required to disclose her name, department, division and location she is working in, to enable the Chairperson to make contact and take the matter forward.
2. The Chairperson of ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably **within 30 days** from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, she will record this finding with reasons and communicate the same to the complainant.
3. If the Chairperson of ICC determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of ICC.
4. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Management as soon as practically possible and in any case, **not later than 90 days from the date of receipt of the complaint**. The Management will ensure corrective action on the recommendations of ICC and keep the complainant informed of the same.

Corrective action may include any and combination of the following:

- a) Formal apology from perpetrator to the satisfaction of the victim.
- b) Counselling to the perpetrator.
- c) Written warning to the perpetrator and a copy of it maintained in the associate's file.
- d) Change of work assignment / transfer for either the perpetrator or the victim.
- e) Suspension or termination of services of the associate found guilty of the offence.
- f) Reporting to authorities who can take legal action in consultation with victim.
- g) In case of complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

VIII. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances, including the name and identity of victim.

IX. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial process or as required by authorities.

X. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no associate 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 victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XI. CONCLUSION

The Company reiterates its commitment to providing its women associates, a workplace free from harassment / discrimination and where every associate is treated with dignity and respect.

Composition of Internal Complaint Committee at Corporate Office of PPAP Automotive Limited

S. No.	Name	Membership
1.	Ms. Sonia Bhandari	Presiding officer
2.	Ms. Anamika Singh	Member
3.	Ms. Anukraty Sharma	Member
4.	Mr. Nitin Mohan	Member
5.	Mr. Bijendra Singh	Member
6.	Ms. Rimjhim Jain	External Member

Each location / unit of PPAP Automotive Limited has a duly constituted Internal Complaints Committee (ICC), details of which can be obtained by any person by writing to any of the above mentioned ICC member.