

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

WheelsEMI has always held in highest regard the dignity of its employees. Our Code of Conduct specifies guidelines on professional behaviour to be practiced at the workplace. It also testifies our commitment to provide a safe, secure and productive work environment to all our employees irrespective of their gender, caste, creed or social class. All employees are expected to maintain decorum at the workplace, respect the dignity of co-workers and contribute in making the work environment conducive for achieving the Company's goals & objectives.

We reaffirm that the Company shall act as per all applicable laws and guidelines including the enacted legislation titled 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the 'Act') by Government of India, Ministry of Law and Justice.

This Policy on Prevention of Sexual Harassment at Workplace (POSH Policy) reiterates the intention of the Company to prevent sexual harassment at workplace.

(1) Objectives of the POSH Policy:

- To prevent sexual harassment at workplace.
- To sensitize the employees about their fundamental right to have safe and healthy environment at their workplace and what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event and consequences of violations.
- To provide guidelines and fair mechanism for effectively dealing with complaints of sexual harassment in case such incidents happen.

(2) Applicability:

The POSH Policy is applicable: -

- (a) To all employees and consultants of WheelsEMI Private Limited, which as per Section 2(f) of the Act, means any person who has been employed at a workplace for any work on regular, temporary, ad hoc or on daily wages basis, either directly or through an agent/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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name (hereinafter collectively referred to as 'Employee/s').
- (b) To employers as defined under point 3 below.
- (c) On office premises and all areas which can be termed as notional extension of employer's premises. It also includes any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey. The incident is covered during/after office hours.

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

- (d) All the visitors & vendors associated with the Company & visiting any premises of the Company, or whose premises our employees visit during the course of business.

(3) Definitions:

Sexual Harassment:

Any form of verbal or physical behaviour which is unsolicited and unwelcomed and interferes with an individual's work performance by creating an intimidating/insecure working environment. Unwelcome sexually determined behaviour (whether directly or by implication) in any form, such as:

- a. Physical contact and advances
- b. Demand or request for sexual favours
- c. Making sexually coloured remarks
- d. Showing pornography
- e. Circulation or publication of any form of physical or electronic form of photographs, pictures or any form of graphical material of an employee, either directly or indirectly, so as to create disrepute to any employee
- f. Implied or explicit promise of preferential treatment
- g. Implied or explicit threat of detrimental treatment
- h. Implied or explicit threat of present/future employment status
- i. Interference with work or creating hostile work environment
- j. Humiliating treatment related to health/safety
- k. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

This list is illustrative and not exhaustive and applicable irrespective of gender.

Employer: As per Section 2(f) of the Act, Employer shall mean any person authorized/designated to be the employer within the means of the Act by WheelsEMI. The Board of Directors of the Company responsible for formulation, approval and adoption of this POSH Policy designates the Managing Directors and the Joint Managing Director of the Company as the Employer for the purpose of this Policy.

Complainant: can be a Person who has been subject to Sexual Harassment and / or any Person reporting an incident of Sexual Harassment. A third party can also be a Complainant, however, a written Complaint from the Person who has been subject to Sexual Harassment is mandatory to be filed with the ICC.

Respondent: The person who is alleged/reported to have committed an act of Sexual Harassment.

(4) Internal Complaints Committee (ICC)

- (a) In order to help implementation of this Policy, an Internal Complaints Committee has been constituted with the following Members:

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

Ms. Abha Gupta	Presiding Officer
Mr. Ritesh Parikh	Member
Ms. Kavita Karwa	Member
Ms. Lolita Kewalramani, Advocate	External Member

- (b) The ICC will investigate all the complaints made under the provisions of the Act and as per this POSH Policy in just and fair manner, record the testimonies & evidences submitted by the alleged harasser i.e the Respondent & a Person who has been subject to Sexual Harassment i.e the Complainant and submit their report to the MD/Jt. MD recommending appropriate redressal disciplinary action. For the purpose of making inquiry, ICC shall have the power to summon witnesses and demand production of documents/evidences required for the investigation.

It is pertinent to mention that the Employer only has the right to punish any accused hereunder and ICC is an advisory body to meet the ends of justice.

- (c) At the end of every financial year, an Annual Report containing all the details like number of complaints filed, the stage of each complaint and number of complaints redressed will be prepared and furnished by ICC to the Company/ Local Complaints Committee appointed by the Government.
- (d) ICC shall maintain records of all sexual harassment cases and findings.
- (e) ICC shall endeavor to spread and increase awareness about this Policy amongst employees and others by way of emails, convening meetings, displaying the Policy on Company's website, etc.
- (f) ICC would also assist Complainants if required to file a Complaint.

(5) Grievance Redressal Procedure:

- (a) An aggrieved person can make a written complaint to any member of the ICC or by e-mail to assure@wheelsemi.com within a period of three months of the occurrence of the incident and in case of series of incidences within a period of three months from the date of last incidence. Provided that where such complaint cannot be made in writing, any member of the ICC shall render all reasonable assistance to the Complainant for making the complaint in writing.
- (b) If ICC is satisfied that the circumstances were such that prevented the Complainant from filling the complaint within said period, they can extend the time limit not exceeding three months.
- (c) The complaint may be made in the format provided in Schedule A, herein or in such manner containing all the information as provided in Schedule A. Only compliant in written containing all requisite information would be considered and any anonymous complaint shall not be entertained. Where the Complainant is unable to file the complaint of their own, their legal heirs or parents, spouse, children or sibling can file the complaint. A third party can also be a Complainant however, a written complaint from the aggrieved Person is mandatory to be filed with the ICC.

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

- (d) ICC will investigate and conduct enquiry with the Complainant as well as Respondent independently seeking detailed information / explanation / reasoning, study the findings and shall then proceed to deal with the complaint in accordance with the Policy and the Act and accordingly submit its detailed finding and recommendation in connection with the complaint to the MD/Jt.MD. within 90 days from receipt of the compliant.
- (e) The MD/Jt.MD may seek clarification from the ICC on the recommendation and decide on the disciplinary action after discussing with the internal 'Code of Conduct Enforcement Committee' and disciplinary action will be implemented by the Head HR within 60 days from the date of receipt of the recommendation from ICC.
- (f) The aggrieved party will be informed of the decision and action taken by the ICC.
- (g) ICC may close the enquiry and/or is not required to initiate same in the event the Complainant fails to appear before the ICC and/or fails to revert to the query(s) raised by the ICC for three consecutive events. The respective ICC shall record the reasons for closure of the complaint accordingly. Further, in the event the Respondent deliberately avoids his / her appearance before the ICC, the employer should direct / instruct the Respondent to appear before the ICC.
- (h) In the event that there are no eyewitnesses, the ICC may have to resolve the claim based on the credibility of the parties. Circumstantial evidence also would play important role during the decision making process by the ICC.
- (i) In case the aggrieved person so desires, the Company shall assist in filing the complaint under the Indian Penal Code (IPC) or any other law. Detailed list of penal section involving sexual harassment is provided in Schedule B, herein.
- (j) The Company would ensure that Complainants or witnesses are not victimized or discriminated against while dealing with complaints. The Company shall ensure that the information about individual complaints and their disposition is considered strictly confidential and that the privacy of the complainant is safeguarded and will be shared only on a 'need to know' basis. However, the ICC / Employer / Company shall not be held responsible under present confidentiality clause in the event the complaint is filed by a third party and/or material facts with regard to complaint are already known to other persons/ individuals.
- (k) In case of a complaint against any of the Members of the ICC/Employer, Head HR will appoint an independent committee to investigate and report the findings to him/her and will take appropriate action. Till the enquiry and action is complete in this case, the Member/Employer against whom the complaint has been received will cease to function as Member of the ICC/Employer for this Policy.

WheelsEMI Private Limited

(formerly known as Varadnarayan Savings and Investment Company Private Limited)

(6) Mala Fide Complaints:

- (a) If the enquiry reveals that the complaint is unjustified or Complainant had raised the concern with ulterior motives/malicious intentions, ICC will counsel the Complainant and recommend suitable disciplinary action to prevent recurrence.
- (b) Requisite penal actions, as mentioned in Schedule B, may be invoked against Mala Fide Complainant.

(7) Disciplinary Action:

- (a) If any employee/employer is found guilty of sexual harassment, appropriate disciplinary action against them shall be taken. The action may include any one or more of the following:
 - a. Warning
 - b. Monetary fine
 - c. Loss of promotion and/or stoppage of increment
 - d. Transfer
 - e. Termination of service
- (b) In case the ICC feels the need for transferring the complainant during the investigation to any other location as a result of the incident. the Company shall assist in such transfer.

(8) Assurance against Retaliation:

This Policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or complaint of sexual harassment. Retaliation against persons who report or provide information about sexual harassment or behaviour that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference, pressure and restraint, by an employee, violates this Policy and will result in appropriate disciplinary actions and the ICC would ensure implementation of the action.

(9) Effective Date:

- This Policy has been approved and adopted by the Board of Directors of the Company on 31st July, 2017 to be effective immediately. (version 1)
- This Policy has been further amended subsequent to the Board of Directors approval on 9th May, 2018. (version 2)

WheelsEMI strongly inspires in providing conducive and healthy work environment where the relationship amongst the employees as well as with the employer are cordial and supporting in all aspects, so that each employee shall have an enriching experience. As responsible citizens and employees/employer, it is our duty to uphold the highest values and together ensure best work atmosphere that is a benchmark for workplace discipline and decorum.

-----X-----X-----X-----