

HR POLICY MANUAL

21. Policy on Sexual Harassment of Employees in CYBELE INDUSTRIES LIMITED

21.1. OBJECTIVE

21.1.1 CYBELE INDUSTRIES LIMITED (CIL), is an equal employment opportunity company and is committed to creating a healthy working environment which paves way for employees to work without fear of prejudice, gender bias and sexual harassment. Wheels Indi believes that all employees of the Company, have the right to be treated with due respect. Sexual harassment at the work place or other than work place is a grave offence and is, therefore, punishable.

21.1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

21.1.3 Further to the Supreme Court Guidelines The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013, has been enacted comes into force with effect from 22nd April 2013. Section (4) of the act requires Employers to frame a policy on Sexual Harassment of Employees applicable to their factory/establishment.

21.2. SCOPE AND EFFECTIVE DATE

21.2.1 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 23.04.2013.

21.2.2 Sexual harassment would mean and include any of the following:

- i) unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - ii) unwelcome sexual advances involving verbal, non-verbal, or physical conducts such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance;
 - iii) eve teasing, innuendos and taunts, physical confinement against one's CIL and likely to intrude upon one's privacy;
 - iv) act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
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- v) conduct of such an act at work place or outside in relation to an Employee of CIL, or vice versa during the course of employment; and
- vi) any unwelcome gesture by an employee having sexual overtones

21.2.3 "Employee" means any person on the rolls of the Company across all Plants of Wheels India including those on deputation, temporary trainee, apprentice, part time or work in gas consultants, including workmen belonging to the contractors.

21.3. COMPLAINT REDRESSAL COMMITTEE

21.3.1 The Committee shall consist of 4 members, of which one CIL be from Non-Government Organization. One of the 4 members can be a male person.

21.3.2 The Chairperson of the Committee is headed by one of the women members

21.3.3 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment.

21.3.4 The quorum for the purpose of meeting/hearing shall be 50% of the members of the Complaints Committee and no meeting shall be conducted without the presence of the External member.

21.3.5 Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

21.3.6 The Complaints Committee shall meet as and when required and review preparedness to fulfill all requirements.

21.3.7 The minutes of every meeting shall be recorded and maintained.

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21.4. REDRESSAL PROCESS

- 21.4.0 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature immediately or as soon as possible but in any case within 10 days of occurrence of incident.
- 21.4.1 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 21.4.2 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case.
- 21.4.3 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 21.4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, whereafter, an "Enquiry" shall be conducted and concluded.
- 21.4.6 In the event of the complaint not falling under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 21.4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

21.5. ENQUIRY PROCESS

- 21.5.0 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the person against whom complaint is made.
- 21.5.1 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she/he so desires within 7 days of receipt of the same.
- 21.5.2 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

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- 21.5.3 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 21.5.4 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 21.5.5 The Committee shall call upon all witnesses mentioned by both the parties.
- 21.5.6 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- 21.5.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to Head of HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 21.5.9 Head of HR CIL direct appropriate action in accordance with the recommendation proposed by the Committee.
- 21.5.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

21.6. OTHER POINTS TO BE CONSIDERED

- 21.6.1 The Committee may recommend to Head of HR action which may include transfer or any of the other appropriated disciplinary action.
- 21.6.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 21.6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, CIL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 21.6.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to Head of HR.

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21.6.5 In case, the Committee find 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.

21.7. Revision and term of the Code and Policy:

21.7.1 This Code shall be reviewed as and when required.