

## Policy against Sexual Harassment / Exploitation

### **Objective:**

1. Schaeffler India Limited ('Company') is committed to provide a safe and healthy working environment for its women employees. This is in line with the Company's code of conduct, which clearly communicates to *provide a work place free of discrimination & harassment on the basis of Gender, Race, Skin, Colour, Religious belief, Age, National origin, Handicap or Sexual orientation. Employees in our work place deserves respect of each other.*
2. This policy is intended to provide protection against sexual harassment of women at work place (Including employee or any other women visiting worksite for any other purpose) and for the prevention and redressal of complaints of sexual harassments and for matters connected therewith or incidental thereto.
3. This policy is in alignment to the sexual harassment of women at work place (Prevention, Prohibition & Redressal) Act 2013.

### **Brief on Policy:**

1. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment: -
  - a. Implied or explicit promise of preferential in her employment; or
  - b. Implied or explicit threat of detrimental treatment in her employment; or
  - c. Implied or explicit threat about her present or future employment status; or
  - d. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
  - e. Humiliating treatment likely to affect her health & safety; or
  - f. Any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: -
    - physical contact and advances
    - a demand or request for sexual favours
    - sexually coloured remarks
    - showing pornography or
    - any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
2. Any act of sexual harassment is strictly prohibited and violation of the policy would be viewed seriously by the Company and such misconduct would invite stringent disciplinary action including termination. Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority. The Company reserves the right to deduct from the salary or wages of the employee found guilty of sexual harassment such as the Company may consider appropriate to be paid to the aggrieved woman employee or her legal heirs.
3. Every woman employee is hereby advised to bring to notice of any incident of sexual harassment to the Internal Complaints Committee (as defined in next page) to ensure redressal.

4. The Company has put in place an appropriate and time-bound complaint mechanism for redressal of complaints made by a woman employee and the Company will ensure that such a complaint would not disadvantage her in connection with her employment or work including recruiting or promotion.
5. Internal Complaints Committee will take lead to organise sessions to create awareness amongst the employees on this topic.
6. If allegations of sexual harassment are found to be false, malicious or any forged or misleading document are produced or it is found that the complaint is made knowing it to be false, the Company shall take stringent disciplinary action against such complainant including termination.

## **Redressal Mechanism – Internal Complaints Committee(“ICC”)**

1. Company has decided to form an internal complaints committee for redressal of any complaint under this policy.
2. The names of the members of the committee will be communicated through notification in prominent place with in the company.
3. Any aggrieved woman employee can approach this committee through a written complaint with in 3 months of the incident. Internal Complaints Committee will ensure that the complaint is kept absolutely confidential.
4. The committee will investigate and conclude within 90 days of the complaint registration. ICC will submit their report to Managing Director of the Company / VP (HR) of the Company.
5. The Company will act on the recommendation of the committee with in 60 days of receipt of report from ICC.

## **Meeting Schedule:**

1. The Committee will hold the meeting at the interval of 3 months or as may be decided by Chairperson.
2. MOM of the each meeting shall be circulated to – Managing Director of the Company / VP (HR) of the Company.

**Dharmesh Arora**  
**Managing Director**  
**Schaeffler India Limited**



**Santanu Ghoshal**  
**Vice President – HR**  
**Schaeffler India Limited**