

ORGANISATION AREA	DOCUMENT TYPE	VERSION
HR	POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE	VERSION 1.0

Approved by the Board of Directors on 23 January 2024.



## BAJAJ AUTO CREDIT LIMITED

Registered office: - Bajaj Auto Complex, Mumbai Pune Road, Akurdi, Pune- 411035

Bajaj Auto Credit Ltd. has always held in highest regard the dignity of its employees. Our Code of Conduct specifies guidelines on professional behaviour to be practised at the workplace. It also testifies our commitment to provide a safe, secure, and productive work environment to all our employees. All employees are expected to maintain decorum at the workplace, respect the dignity of co-workers and contribute to 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 legislation titled Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace Act, 2013 by Government of India. 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 spread awareness among employees about sexual harassment and consequences of violations.
- To provide guidelines and mechanism of effectively dealing with complaints of sexual harassment in case such incidents happen.

**(2) Applicability:**

Workplace means all plants, locations, and regional offices of the Company, including any place visited by the employee arising out of or during the course of employment including transportation provided by the company for undertaking such journey.

This Policy is applicable to all employees, including trainees, apprentices and probationers of the Company at all its locations. Redressal under this policy can also be sought by visitors/ employees of business partners who deal with the Company's employees and come across any such incident.

**(3) Definition of Sexual Harassment:**

Sexual Harassment includes:

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography

- 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
- Implied or explicit promise of preferential treatment
- Implied or explicit threat of detrimental treatment
- Implied or explicit threat of present or future employment status
- Interference with work or creating hostile work environment
- Humiliating treatment related to health / safety
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

**(4) Internal Complaints Committee (ICC):**

In order to help implementation of this policy, an Internal Complaints Committee has been constituted with the members defined in Appendix I:

- The ICC will investigate the complaints of sexual harassment, record the testimonies & evidence, submitted by all parties, and recommend appropriate redressal / disciplinary action to CHRO.
- For the purpose of making inquiry, ICC shall have the power to summon witness and demand production of documents / evidence required for the investigation.
- The ICC will submit an annual report to the Company/ Local Complaints Committee appointed by the Government.

**(5) Grievance Redressal Procedure:**

- An aggrieved person can make a written complaint to any member of the ICC within three months of the occurrence of the incident.
- ICC will investigate and submit its recommendation to CHRO within 90 days from receipt of the grievance.
- CHRO will decide on the disciplinary action after discussing with the 'Enforcement Committee and disciplinary action will be implemented within 60 days from the date of receipt of the recommendation from ICC.
- The aggrieved party will be informed of the decision and action taken by the ICC.
- In case the aggrieved person so desires, the company shall assist in filing the complaint under the IPC or any other law.
- The Company shall ensure the confidentiality of complaints and ensure that the privacy of the complainant is safeguarded.
- In case of a complaint against any of the members of the ICC, MD 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 against whom the complaint has been received will cease to function as member of the ICC.

**(6) Disciplinary Action:**

- If any employee is found guilty of sexual harassment, appropriate disciplinary action against the said employee shall be taken. The action may include any one or more of the following:
  - Warning
  - Monetary fine
  - Loss of promotion and/or stoppage of increment
  - Transfer
  - Termination of service
- In case the ICC feels the need to transfer the complainant during the investigation to any other locations as a result of the incident, the Company shall assist in such transfer.
- If the ICC finds the allegations to be wilfully false, fabricated with malicious intentions, appropriate disciplinary action will be taken against the complainant.

As responsible citizens and employees, it is our duty to uphold the highest values and together create at work atmosphere that is a benchmark for workplace discipline and decorum.

**Appendix I**

**Internal Complaints Committee**

<b>S.No.</b>	<b>Name</b>	<b>Position</b>
1	Gayatri Panchal, DGM (Operation compliance)	Presiding Officer
2	Khushboo Bherwani, Divn Manager (HR)	Member
3	Suresh Subramaniam, VP (Finance)	Member
4	Nikita Pathak, Sr Mgr (Sales Compliance)	Member
5	Priyanka Bondre, DM (TW Sales)	Member
6	Archana Singh, Advocate	External Member

Place : Pune

Date : 23 January 2024

RAJIV BAJAJ  
CHAIRMAN