01. Objective:

The objective of this policy is to provide guidelines relating to Prevention of Sexual Harassment at Workplace in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and Tata Code of Conduct (TCoC).

02. Scope:

This policy is applicable to all the employees working in any capacity including retainers on full / part time basis and trainees engaged in any manner/terms including Apprentices enrolled with Manufacturing plants / Offices of any of the Business Units of Tata AutoComp Systems Limited and its group entities based in India and outside India.

This policy shall be applicable to all written complaints of sexual harassment made:

a. By an employee of the company against an employee of the company working within or outside of India.
b. By an employee of the customer or client company working within or outside India.
c. By an employee of the company against an outsider, visitor, professional or consultant, who may have caused sexual harassment to her during the course of her employment and within the premises of company, in India or outside of the country, of the company or its client or customer company.
d. By any female/male against a male/female employee of the company working within or outside of India only if the act of sexual harassment occurred during the course of employment and within the premises of the company's in India or outside the country, of the company, or its client or customer company.
e. This policy shall also be applicable to occurrence of sexual harassment perpetrated by a female to male employee and / or by persons having homosexual orientation.

03. Commencement Date:

This policy comes into effect from May 01, 2013.

04. Applicable Statute:

The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 or any such statute which may come into force in future and Tata Code of Conduct (TCoC)

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05. Activities prohibited:

Activities prohibited include any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely, but not limited to :

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

Sexual Harassment may include any of the following but not limited to:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
- Physical contact and advances;
- Demand or request for sexual favours;
- Sexually coloured remarks, including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography or the likes
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas
- Verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature
- Teasing, innuendos and taunts, physical confinement and /or touching against ones will and likely to intrude upon ones privacy

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in the employment
- Implied or explicit threat or detrimental treatment in the employment
- Implied or explicit threat about the present or future employment status
- Interference with the work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety

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06. Formation of Internal Committee:

To deal with the complaints pertaining to sexual harassment, every Business Unit location shall constitute an Internal Committee (IC), as specified by the applicable Act consisting of,

a. One Presiding Officer (Senior woman employee of the BU),
b. Minimum two additional members, and
c. One External member (having knowledge in the field)

At least 50% of the Committee members shall be female employees.

07. Complaint and complaint resolution Mechanism:

The sexual harassment complaint shall be submitted to the Presiding Officer or any member of the Internal Committee (IC) ideally within three days but no later than three months from the date of occurrence of the incident.

IC before initiating enquiry, at the request of the complainant, shall take steps to settle the matter between complainant and the defendant through conciliation, subject to defendant accepting the mistake.

IC shall submit the report along with recommendations to the BU Head/BU HR Head to take appropriate action. Management shall take appropriate action commensurate with gravity of offence.

In other cases, where the complainant has not asked for settlement through conciliation, the IC shall investigate the complaint and submit the report/ findings to BU Head/ BU HR Head,

The BU Head/ BU HR Head shall initiate appropriate disciplinary action against the Accused, commensurate with the nature and gravity of the offence e.g. warning, written apology, bond of good behavior, suspension, dismissal.

The form in which the complaint is required to be made is annexed as Annexure 1 to the Policy. This form will be available with the IC and also in HR Forms Section of KM Portal. However, any written complaint received in any form other than the form prescribed in Annexure 1 shall also be accepted. The complaint can be submitted to the IC electronically or may be physically submitted to any IC member. The IC may, but shall not be bound to, accept oral complaints under this Policy.

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08. Monitoring of Policy:

This policy will be amended at appropriate time, as decided by the management.

09. Power to Amend:

The company reserves the right to amend the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at the sole discretion of the Management.

Sudipta Marjit

Sudipta Marjit
Group Head – HR, BE, OSM

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ANNEXURE 1
COMPLAINT FORM

1. **Details of Aggrieved Individual**

Name	Designation	Division & Department	Contact Numbers (Landline and Mobile)	Office Address

2. **Details of Complainant (in case the Complainant is not the Aggrieved Individual)**

Name	Relationship with Aggrieved Individual	Contact Numbers (Landline and Mobile)	Address

3. **Details of individual alleged to have engaged in sexual harassment**

Name	Designation	Division & Department	Contact Numbers (Landline and Mobile)	Office Address

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4. Details of the incident(s)

Sr. No.	Nature / Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

5. Additional information and comments if any:

Date & Signature of Aggrieved Individual **Date & Signature of Complainant**

Mr. Viplav Bhat	Mr. Deepak Joshi	Mr. Sudipta Marjit
Prepared By	Reviewed By	Approved By

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