



## TALBROS ENGINEERING LIMITED

CIN: L74210HR1986PLC033018

Regd. Office: Plot No. 74-75-76, Sector-6, Faridabad, Haryana – 121006

Telephone: +91-129-4284300, Fax: +91-129-4061541

Email: [cs@talbrosaxles.com](mailto:cs@talbrosaxles.com), Website: [www.talbrosaxles.com](http://www.talbrosaxles.com)

TALBROS ENGINEERING LIMITED	POLICY NO.:	TEL/HR/P11
Policy of Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Amendment Act, 2022	EFFECTIVE DATE:	April 1, 2015
	REVISION NO.:	TEL/HR/P11-01
	REVISION DATE:	April 1, 2019
An Internal Complaints Committee (ICC) is a committee in a workplace that addresses complaints of sexual harassment.		

### 1. Objective

The Management of Talbros Engineering Limited is committed to providing working environment free from harassment of any kind & zero tolerance for sexual harassment with women or men. We respect dignity of everyone in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect, dignity and positive regard towards each other.

### 2. Scope

This Policy extends to all employees, working in any plant directly or indirectly and the suppliers, our customers & visitors. This Policy shall deal with any and all allegations/complaint(s) of Sexual Harassment made by an Employee(s) against an Employee(s), irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises or against employees engaged through third party, business associates, suppliers, vendors, customers visitors and any other related party.

### 3. Definitions

“**Employee**” means any person working in the Talbros Group comprising of plants at difference sites.

“**Employer**” means” any person responsible for the management, for supervision and control of the workplace.

Explanation: For the purposes of clarification “management” includes the person nominated by the board or committee responsible for formulation and administration of polices for the organization.

### 4. Nature of Sexual Harassment

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person’s body made in their presence or directed toward them.



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- c) Any other unwelcome physical, verbal or non-verbal gesture or conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media
- e) 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, as defined in (a) above, may amount to sexual harassment;
  - i. implied or explicit promise of preferential treatment at work; or
  - ii. Implied or explicit threat of detrimental treatment at work; or
  - iii. Implied or explicit threat about present or future employment status; or
  - iv. Interference with work or creation of an intimidating or offensive work environment; or
  - v. Humiliating treatment likely to affect health, safety or self-esteem.

### **5. Virtual Sexual Harassment**

Talbros Engineering Limited has moved to a virtual workspace by staying in touch via smartphones or web callings, etc. With this change in the work environment, it is essential that the employees and managers carry the professional code under POSH during all such virtual interactions as well.

### **6. Policy statement**

- a) All TEL employees will maintain high standards of dignity, respect and positive regard for one another and with all those to whom this policy is applicable, in all their dealings.
- b) All TEL employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All TEL employees are required to maintain a work environment, which is free from any kind of harassment.
- d) TEL employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) TEL employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.



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### 7. Process

#### Internal Complaints Committee (ICC) -Members of Internal Complaint Committee

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women, Minimum 2 members from the management & 4 members from the employee subject size of the plant.

The present Members of the ICC shall comprise of the following;

- a) One Presiding Officer who shall be a senior level woman employee of the Company;
  - b) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
  - c) One outside member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.
- The ICC shall under the authorization of the management or committee responsible for formulation and administration of policies for the organization or any other Senior officer or COO/ VP nominated by the management, have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.
  - The management may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

In order to remain more accessible and substantially compliant in law while dealing with the issues of sexual harassment of employees at work place, the management has decided to restructure the Internal Committees to make it more region specific, as under:

The Internal Committee shall comprise of one core committee.

#### (CORPORATE OFFICE):

The Core Committee shall consist of the following committee members;

<b>Presiding Officer:</b>	<b>Ms. Veena Arora</b>	<b>Employee</b>
	<b>Mr. Girish</b>	<b>Employee</b>
<b>Members:</b>	<b>Ms. Radhika Kaushik</b>	<b>Employee</b>
	<b>Ms. Sapna</b>	<b>Employee</b>
<b>External Members:</b>	<b>Ms. Madhuri Bakshi</b>	<b>External Member</b>



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The Approval Committee shall consist of the following committee members;

**Mr. Gaurav Gogia / Mr. Satish Bhat**

**Management**

The aforesaid committee shall deal with the complaints received from TEL (Sector-06, 04, 05, NAPCO, IMT & HATHIN).

Further, as also required by the law, in order to prevent the possibility of any undue pressure or influence, such Panel / Complaints Committee also involves a third party (not associated with TEL and any of its subsidiaries / Associate companies) who is familiar with the issue of sexual harassment.

The minimum quorum out of the 6 members (including the VICE PRESIDENT) three member are must for conducting all the proceedings under the Sexual harassment cases.

In the event any member of the aforesaid committee ceases or exits its association with the Company for whatever reason, the Management shall appoint a replacement of the same within 30 days thereof. Further, if a member wishes to voluntarily resign for the Complaints Committees, he/she shall submit its resignation to the Management.

The Presiding Officer and every Member of the Internal Committee shall hold office to a maximum period of three years, from the date of their nomination.

The External member of committee shall be paid such fees or allowances for holding the proceedings of the Internal Committee, as may be agreed between the management and the member.

### **8. Grievance Procedure**

- a) Any Employee (“Complainant”) may lodge a complaint of Sexual Harassment (“Complaint”) against an (“Accused”) who could be any employee or anyone else upon whom this policy is applicable, with any of the members of the Panel or through whistle Blower platform within 30 days from the date of occurrence of the alleged incident. If the Complainant feels that she /he cannot disclose her/his identity for any particular reason with the Panel members, she/he can address the complaint to the Managing Director/Whistle officer of the Company or management.
- b) Such a Complaint shall necessarily be in writing.
- c) The Complainant shall sign at the foot of each page of the Complaint.
- d) The Complaints Committee will hold a meeting with the Complainant within a period of 15 (fifteen) days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same.
- e) At the first meeting of the Complaints Committee, the Complainant shall be heard and her/ his statement



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recorded (Statement of Allegation). The Complainant can produce corroborative material with a documentary oral material, etc., to substantiate his / her complaint/ allegations.

- f) Thereafter, the Accused will be called by the Complaints Committee and will be informed of the Complaint and an opportunity will be given to the Accused to give an explanation, whereafter, an “Enquiry” shall be conducted.
- g) However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.
- h) In case the complaint made by the complainant is found to be false and *malafide* at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Service Rules.

### **9. Procedure for Enquiry**

- a) The Complaint’s Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Accused in writing. The Complaints Committee shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings, shall endorse the same in token of authenticity thereof.
- b) The Complaints Committee shall hand over the Statement of Allegation to the Accused and give an opportunity to the Accused to submit a written explanation if she/ he so desires within 15 days of receipt of the same.
- c) The Complainant will be provided with a copy of the written explanation submitted by the Accused.
- d) If the Complainant or the Accused desire any witness/es to be called, they shall communicate in writing to the Complaints Committee the names of witness/es whom they propose to be called.
- e) If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she / he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he / she shall supply true copies of such documents to the Complaints Committee and will affix his / her signature on the same to certify it to be a true copy.
- f) If the Complainant or the Accused desire any witness/es to be called, they shall communicate in writing to



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the Complaints Committee the names of witness/es whom they propose to be called.

- g) If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she / he shall supply true copies of such documents to the Complaint Committee. Similarly, if the Accused desires to tender any documents in evidence before the Complaints Committee he / she shall supply true copies of such documents to the Complaint Committee and will affix his / her signature on the same to certify it to be a true copy.
- h) The Committee will call upon all witnesses mentioned by both the parties.
- i) The Complaints Committee will provide every reasonable opportunity to the Complainant and to the Accused, for putting forward and defending their respective cases.
- j) The Internal Complaints Committee shall complete the “Enquiry” as soon as is reasonably possible and communicate its findings to the Management preferably within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
- k) Where the Internal Complaints Committee arrives at the conclusion that the allegation against the accused/respondent has been proved, it shall recommend to the Management to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent.
- l) The management or any one nominated by the management shall take appropriate action in accordance with the applicable provisions of law, while keeping in view the principles of Natural Justice and equity.
- m) The Complaints Committee shall be governed by the provisions of Prevention of Sexual Harassment at work (prevention, prohibition and redressal) Act and the rules made thereunder, besides Service Rules & Regulations, while taking into account the best practices.

### **10. Confidentiality:**

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, findings of the Internal Committee and the action taken by management of Bata India shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.



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### **11. GENERAL INSTRUCTIONS**

#### **Protection against Victimization**

- The Company is duty bound to take appropriate steps to prevent sexual harassment.
- The victim of Sexual Harassment has the option to seek transfer of the perpetrator or his / her own transfer from one department/branch/station to another.

#### **Obligation of the Management**

- The Management of the Company shall provide all necessary assistance ensuring effective implementation of this policy.

#### **Third Party Harassment**

- Where sexual harassment occurs as a result of an act or omission by any third party or an outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

#### **Annual Report**

- The Internal Complaint Committee shall prepare in such form and at such time as may be prescribed an Annual report at the end of each Calendar/financial year of the Company, giving a full account of its activities during the previous year and forward a copy thereof, to the Management or the person/committee nominated and forward the consolidated report as mandated under the Act to the concerned Authorities.