

**Jullundur Motor Agency (Delhi) Limited
("JMADL" / "COMPANY")**



**Policy on
Prevention of Sexual Harassment
at Workplace**

PREAMBLE:

The Board of Directors (the “**Board**”) of Jullundur Motor Agency (Delhi) Limited (the “**Company**”) has adopted this policy on “Prevention of Sexual Harassment at Workplace” (the “**Policy**”) in compliance with the requirements of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with Rules made there under.

OJECTIVE AND COMMITMENT:

Company and its associates and group companies (collectively referred to as “**JMA Group**”) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. JMA Group is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

JMA Group will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment whatsoever.

SCOPE:

This policy applies to all categories of employees of the Company & JMA Group, including persons employed for any work on regular permanent management and workmen, temporaries, ad hoc or daily wage workers, trainees, either directly or through an agent or otherwise, whether the terms of employment are express or implied and includes a contract worker, probationer, trainee, apprentice or called by any other such name at their workplace or at branches across India. JMA Group will also not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- All RM Offices, Branch offices or other premises where business operations of the Company and JMA Group are operated and conducted;
- All permitted and allowed activities relating to business of the Company / JMA Group are performed at any other site/office/place away from respective premises of JMA Group;
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome physical contact and sexual advances, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes

- Unwelcome sexual advances (verbal, written or physical);
- Demand or request for sexual favours;
- Any other type of sexually-oriented conduct including showing pornography;
- Verbal abuse or ‘joking’ that is sex-oriented, etc;
- Any conduct that has the purpose or the effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company / JMA Group have a personal responsibility to ensure that their behaviour is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Complaints Committee(s)**” (hereinafter referred to as “**Committees**”) has been created by JMA Group for time-bound redressal of the complaint made by the victim.

COMPOSITION OF COMPLAINTS COMMITTEES / COMMITTEES:

Company / JMA Group has instituted Committees for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints under this Policy will be received by the Committees for each of the group companies which will comprise of the following four members out of which at least two member will be women. Composition of each Committee will be as under:

Presiding Officer	A woman employed at a senior level at the workplace from amongst the employees
Members	<ul style="list-style-type: none">➤ Two members from amongst the employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and➤ An independent member from an NGO or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

Presiding Officer and other member of the Committee shall hold office for a period not more than 3 years from the date of appointment.

RESPONSIBILITIES OF COMMITTEES:

The Committee is responsible for:

- a) Investigating every formal written complaint of sexual harassment;
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- c) Discouraging and preventing employment-related sexual harassment.

PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

Company / JMA Group are committed to providing a supportive environment to resolve concerns of sexual harassment as under:

i) Informal Resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Committee for redressal of their grievances. The Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

ii) Complaints:

- a) An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Committee constituted by the Company / Management/ JMA Group. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email to Presiding Officer. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
- b) Presiding Officer of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
- c) In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
- d) If the Presiding Officer of the Committee determines that the allegations constitute an act of Sexual Harassment, she will proceed to investigate the allegation with the assistance of the other members of the Committee.
- e) Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company / JMA Group, as the case may be, shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- f) The Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board of Directors of the respective company as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. Board of Directors of respective company will ensure corrective action on the recommendations of the Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology;
- b. Counselling;
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file;
- d. Change of work assignment / transfer for either the perpetrator or the victim;
- e. Suspension or termination of services of the employee found guilty of the offence.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

CONFIDENTIALITY:

Company / JMA Group understand that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by RJC except where disclosure is required under disciplinary or other remedial processes.

PROTECTION TO COMPLAINANT / VICTIM:

Company / JMA Group is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

Company / JMA Group will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

MODIFICATION OF POLICY:

The Board in consultation with the Committee shall have the power to amend any of the provision(s) of this Policy and or substitute any of the provision(s) with a new provision and or replace this Policy entirely with a new Policy.

CONCLUSION:

In conclusion, Company / JMA Group reiterate its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

CONTACT DETAILS OF COMMITTEE ARE ON NEXT PAGE

COMPOSITION AND CONTACT DETAILS OF COMMITTEE ARE AS UNDER:

1. Mrs. Aditi Arora (Vice President) – Presiding Officer;
2. Mrs. Sarita Rana (MIS – Assistant) – Member;
3. Mr. Ramkesh Pal (Asst. Company Secretary) – Member; and
4. Mrs. Keerti Jayaram (Member of Organization for Early Literacy Promotion) – Member

Victim of harassment may approach to the committee on below mentioned address:

Mrs. Aditi Arora

Presiding Officer;

Committee for Prevention of Sexual Harassment of Women at Workplace;/
Jullundur Motor Agency (Delhi) Limited
458-1/16, Sohna Road,
Opposite Gurgaon Courts, Gurgaon – 122001,
Haryana, India

Alternatively, complaint may be made at jmaadminlegal@jmaindia.com or aditiarora@jmaindia.com

Victim may approach at +91 124 3019210 for assistance to raise concern/complaint against victimization and contact to Mrs. Aditi Arora or Mr. Ramkesh Pal.