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## 1 Objective

- 1) Igarashi Motors India Limited (the “Company” or “IG Group”) is committed to providing a work environment that is free from discrimination and unlawful harassment. Actions, words, jokes, or comments based on race, colour, gender, sex, pregnancy, national or ethnic origin, descent, disability, marital status, family status, or any other legally protected category shall not be tolerated.
- 2) This Policy lays down principles and guidelines of the Company in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”), to:
  - Prevent sexual harassment at the workplace
  - Provide a redressal mechanism for complaints
  - Educate employees on conduct constituting sexual harassment
  - Ensure fairness, confidentiality, and non-retaliation during the process
- 3) This Policy applies equally to all genders and is intended to ensure inclusivity across the workplace.
- 4) The Company commits to measure the effectiveness of this Policy through quantifiable indicators such as:
  - percentage of employees trained annually
  - number of awareness sessions conducted
  - resolution rate of complaints within 90 days
  - training coverage of contractors, vendors, and interns.

## Part I

Sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and otherwise.

## 2 Definitions

With respect to Part I of this Policy:

“**Act**” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;

“**Accused**” means the person accused of committing an act of sexual harassment;

“**Committee**” means the internal complaints committee of IG constituted for adjudication and redressal of complaints regarding sexual harassment;

“**Complainant**” means a man or a woman, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Accused;

“**Employees**” means and includes the following:

- a) permanent employees of IG;
- b) consultants;
- c) retainers;
- d) interns (limited to their internship period at IG);
- e) daily wage employees; and
- f) contract workers;

“**HR Department**” means the human resource department of IG;

“**IPC**” means the Indian Penal Code, 1860;

**“Local Complaints Committee”** means a local complaints committee required to be constituted by the government in every district to receive complaints of sexual harassment from establishments where the internal complaints committee has not been constituted or if the complaint is against the employer himself;

**“NGO”** means a non-governmental organisation committed to the cause of sexual harassment and for this Policy refers to

**“Sexual Harassment”** means sexual harassment as defined in Clause 4.1; and

**“Workplace”** means any and all offices of IG and includes any place visited during the course of employment including the transportation provided by IG for undertaking such journey.

### 3 Scope

1. Part I of this Policy is applicable to all Employees whether working in the office premises or any place outside, which is visited by the Employees during the course of work on or behalf of IG and includes the mode of transport provided by IG for undertaking such work.

This Policy also extends to Company-sponsored events, client sites, vendor premises, training programs, business travel, and any social or professional gathering connected with the Company's business. It further applies to virtual/online workspaces such as email, messaging platforms, video conferencing, and other digital modes of work communication.

2. In the event, any instance of sexual harassment with respect to an Employee of IG occurs, as a result of an act by a third party or an outsider arising out of and during the course of employment, a Committee shall take all necessary and reasonable steps to assist such affected Employee in terms of support and preventive action, including, but not limited to, providing assistance to the Employee, if he or she so wishes to file a complaint under the IPC.

The Company also commits to preventive engagement with third parties (such as vendors, suppliers, contractors, and visitors) through awareness, contractual obligations, and codes of conduct to minimize risks of harassment involving external stakeholders.

3. For the purpose of Part I of this Policy, a Complainant means any man or woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Accused.

This inclusivity applies to all genders and sexual orientations, ensuring that protections under this Policy extend beyond binary definitions to create a safe and respectful environment for everyone.

4. The Policy covers not only Employees but also contractual staff, trainees, apprentices, interns, consultants, Board members, vendors, service providers, and logistics partners who interact with the Company in any capacity.
5. The Company shall review the applicability and scope of this Policy on an annual basis to ensure it remains relevant to evolving modes of work, stakeholder relationships, and legal/ESG requirements.

### 4 Definition of Sexual Harassment

The term “sexual harassment” is defined to include any one or more of the following unwelcome conduct, acts or behaviour whether physical, verbal, textual, graphic, electronic or by any other action (whether directly or by implication) namely:

- a) physical contact and advances; or
- b) a demand or request for sexual favors; or
- c) sexually colored remarks; or

- d) showing pornography; or
- e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- f) inappropriate or sexually suggestive emails, messages, posts, or digital content shared via professional or personal devices used for work purposes; or
- g) persistent unwelcome attention, including stalking, following, or intrusive questions of a sexual nature; or
- h) offensive jokes, gestures, sounds, or display of sexually explicit material, even in a virtual or remote work setting.

If the following circumstances, among other circumstances, occur or are present in relation to or connected with any act or behaviour of sexual harassment mentioned in Clause 4.1, it may amount to sexual harassment:

- a) implied or explicit promise of preferential treatment in his or her employment; or
- b) implied or explicit threat of detrimental treatment in his or her employment; or
- c) implied or explicit threat about his or her present or future employment status; or
- d) interferes with his or her work or creating an intimidating or offensive or hostile work environment for him or her; or
- e) humiliating treatment likely to affect his or her health or safety.
- f) creating an environment—physical or digital—that demeans, humiliates, or excludes an Employee on the basis of gender, gender identity, or sexual orientation; or
- g) using authority, seniority, or influence to coerce or pressure an Employee into tolerating inappropriate conduct; or
- h) retaliation or victimization of the Complainant, witness, or any person supporting the inquiry process.

Sexual harassment may occur between peers, across hierarchies, or involving third parties such as vendors, contractors, clients, service providers, or visitors. It can also occur outside the physical workplace, including at Company-sponsored events, business travel, or online platforms used for work.

## **5 Constitution and Term of the Internal Complaints Committee**

1. IG has constituted a Committee located at each of its offices, namely Chennai.
2. The Committee shall comprise of the following members:
  - a. A presiding officer, who shall be a woman employed at a senior level from amongst the employees of IG. In case a woman at a senior level (Employee) is not available, the presiding officer shall be nominated from other offices;
  - b. Not less than two (2) members from the Employees (preferably who have had experience in social work or have legal knowledge); and
  - c. One (1) member from a non-governmental organisation or association (a person familiar with the issues relating to sexual harassment).
3. At least one half of the total members of the Committee shall comprise of women.
4. The member appointed from among the non-governmental organisations or associations shall be paid such fees or allowances for holding the proceedings of the Committee, as may be prescribed under applicable law.
5. The presiding officer or any member of the Committee cannot hold office for a period exceeding three (3) years from the date of their nomination. In addition, changes in the constitution of the Committee whenever necessary shall be made as expeditiously as possible within fifteen (15) days of the date of vacancy of the office by the presiding officer or member.
6. Currently the Committee at the Chennai office comprises of the following members:

Sl. No.	Name	Designation	Contact
1	Ms.Brinda	Presiding officer	042298542
2	Ms.Nithya	Member	042298103
3	Ms.Renuka	Member	042298105
4	Ms.Amuthalakshmi	Member	040981311
5	Mr.Premkumar	Member	042298603
6	Ms.Radha Subramanian	NGO	98409 53298

7. The Committee shall receive regular training and orientation on handling complaints, legal provisions, trauma-informed inquiry, and maintaining confidentiality. Training attendance and evaluation records shall be maintained by the HR Department.
8. To ensure transparency and accountability, the Committee shall:
  - a. Track and report measurable KPIs such as number of cases filed, percentage resolved within 90 days, number of awareness sessions conducted, and percentage of employees trained annually.
  - b. Include such data in the Company's annual HR report and, where relevant, in ESG disclosures (e.g., GRI 406, BRSR).
9. The ICC shall also cover cases involving contract workers, interns, trainees, consultants, vendors, and third-party service providers, and shall work with Procurement and HR to ensure preventive awareness is extended to suppliers and contractors.
10. This policy and the constitution of the Committee shall be reviewed at least every two year, or earlier if there are significant legal or regulatory changes, to ensure ongoing compliance and effectiveness.
11. The Committee shall make the policy accessible by providing simplified guidance, FAQs, and visual infographics for all employees, to ensure clear understanding across staff levels.
12. This policy applies to all genders and is inclusive of men, women, and persons of diverse gender identities and sexual orientations.

## 6 Removal of Members of the Committee

1. The presiding officer or any member of the Committee shall be removed from the Committee if:
  - a. he/she makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the contents of a complaint, the identity and addresses of the Complainant, Accused and witnesses, details of the conciliation and inquiry proceedings, recommendations of the Committee, or the action taken by IG. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or
  - b. he/she has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her; or
  - c. he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
  - d. he/she has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.

In case the presiding officer or any member of the Committee is removed on the basis of the above-mentioned grounds then the vacancy so created shall be filled by fresh nomination in accordance with the provisions of Clause 5.2.

2. In addition to the above, members shall also be removed if they fail to:
  - a. Maintain impartiality and fairness in proceedings, including conflict of interest disclosures.
  - b. Attend mandatory POSH trainings and orientation programs designed to ensure competence.
  - c. Fulfil Committee responsibilities such as timely completion of inquiries, maintaining records, or adhering to statutory timelines.
3. Any instance of misconduct, bias, or dereliction of duty by a Committee member shall be documented, and such cases shall be reviewed by the HR Department in consultation with the Managing Director for appropriate action.
4. The Company shall ensure that vacancies arising from removal are filled within fifteen (15) days to avoid disruption in access to redressal mechanisms.

## 7 Duties & Responsibilities of the Internal Complaints Committee

1. The ICC shall discharge the following functions in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and the rules made thereunder:
  - a. Receive complaints of sexual harassment from Complainants and ensure they are acknowledged in writing within the statutory time period.
  - b. Initiate and conduct a fair, impartial and timely inquiry into complaints received, ensuring adherence to principles of natural justice, confidentiality, and statutory timelines.
  - c. Provide assistance to the Complainant in filing a complaint under the Indian Penal Code, if requested.
  - d. Recommend interim measures during the pendency of the inquiry, such as transfer of either party, leave for the Complainant, or other relief measures as may be appropriate.
  - e. Prepare inquiry reports with findings, recommendations, and corrective actions, and submit them to the Employer for implementation.
  - f. Prepare an Annual Report with details of the number of complaints received, disposed of, cases pending, and workshops/trainings conducted. This shall be submitted to the District Officer and included in the Company's HR disclosures.
  - g. Maintain strict confidentiality of all proceedings, information, and records relating to complaints.
2. **Enhanced Responsibilities (beyond statutory requirements):**
  - a. Track and report measurable KPIs, including:
    - i. % of employees trained on POSH annually (segmented by staff, contractors, senior management).
    - ii. % of Committee members trained and evaluated annually.
    - iii. % of complaints resolved within 90 days.
    - iv. Number of awareness sessions conducted and attendance coverage.
  - b. Integrate POSH-related metrics into ESG reporting frameworks such as GRI 406 (Non-discrimination), GRI 2-23 (Policy commitments), and BRSR disclosures, demonstrating organizational accountability.
  - c. Conduct proactive awareness and sensitization programs at least twice annually, covering not only employees but also contract staff, interns, and third-party vendors. Training formats may include workshops, e-learning modules, posters, and digital campaigns.
  - d. Develop simplified POSH awareness materials such as FAQs, infographics, and quick-reference guides to make the policy accessible across all levels of employees.

- e. Ensure inclusivity: extend policy coverage and awareness sessions to all genders and sexual orientations, emphasizing a workplace free from harassment for everyone.
- f. Review all complaints and inquiry outcomes for systemic issues (e.g., repeated incidents in a particular department or vendor group) and recommend preventive and corrective actions to Management.
- g. Review the effectiveness of the policy and Committee functioning annually and propose updates to align with legal requirements and best practices.

## **8 Obligations of IG**

### **8.1 Obligations of IG shall include:**

- a) providing a safe and secure working environment within the office premises;
- b) ensuring that employees are made aware of this Policy and any applicable law at the time of induction;
- c) displaying at any conspicuous place in the workplace of IG, the Policy, any applicable law, the penal consequences of sexual harassment, and constitution of the Committee;
- d) maintaining records of all the sexual harassment cases and findings;
- e) assisting and providing necessary facilities and information to the Committee in the redressal mechanism and ensuring speedy disposal of the complaint;
- f) providing assistance to the Complainant if he or she chooses to file a complaint in relation to the offence under the IPC or any other law for the time being in force;
- g) monitoring timely submissions of reports by the Committee;
- h) treating sexual harassment as a misconduct and initiating action for such misconduct as soon as possible; and
- i) organising workshops and initiating awareness programmes at regular intervals, for sensitising the Employees with the provisions of Part I of this Policy and orientation programmes for the members of the Committee in this regard.

### **8.2 Additional Obligations:**

- a) This Policy shall be reviewed at least once every year, or earlier if required by law or organizational changes.
- b) The Company shall ensure accessibility of this Policy to all employees by circulating simplified versions, FAQs, or visual communication aids across languages where applicable.
- c) POSH-related responsibilities shall also extend to third-party stakeholders (vendors, contractors, suppliers, logistics providers) through contractual clauses and awareness measures, thereby promoting a safe working environment beyond Company premises.
- d) IG shall track and disclose measurable effectiveness indicators (e.g., percentage of staff trained, percentage of complaints resolved within statutory timelines), for continuous improvement.

## **9 Complaint Mechanism**

1. A Complainant should promptly report the incident of sexual harassment to the following designated persons:
  - a. the immediate senior, or any senior designated for hearing such complaints; or
  - b. the human resources representative; or
  - c. any member of the Committee.
2. In addition to the above, the Complainant may also submit their complaint in the SHe-Box, which will be made available in each unit. A member of the POSH Committee will have access to this box and will take appropriate action accordingly.



3. Where a complaint is made verbally, the person to whom such complaint is made shall put the verbal complaint in writing in the presence of the Complainant and shall, for the purposes of authentication of the record, sign the recorded complaint after examining it.
4. The complaint shall be made within a period of three (3) months from the date of the incident and in case of a series of incidents, within a period of three (3) months from the last incident. Such time limit can be extended by a maximum of three (3) months with reasons to be recorded in writing by the Committee if it is satisfied that there existed circumstances which prevented the Complainant from filing the complaint.
5. In case of physical or mental incapacity or death or otherwise, the legal heir of the Complainant or such other person as prescribed under applicable law will be entitled to make the complaint.
6. Additional Provisions (Gap-Closing):
  - a. Complaints may also be filed through digital modes such as a designated Company POSH email ID or secure online platform, ensuring accessibility for remote or traveling employees.
  - b. Anonymous complaints will be accepted to the extent practicable, and the ICC shall make preliminary assessments while balancing fairness and due process.
  - c. Employees, contractors, and third parties (vendors, suppliers, consultants, logistics providers) who are covered under the scope of this Policy shall also have access to the complaint mechanism.
  - d. Awareness of available complaint channels (HR, ICC, SHe-Box, digital modes) shall be reinforced through induction, refresher trainings, and regular workplace displays.

## **10 Inquiry and Investigation**

1. Prior to initiating an inquiry, the Committee may, upon the request of the Complainant, take steps to settle the matter through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
2. Where a settlement has been arrived at on the basis of conciliation, the Committee shall record the settlement so arrived at and forward it to IG, in order for IG to take specified action as stated in the settlement. The copies of the settlement shall also be provided to the Complainant and the Accused.
3. In the event a settlement has been arrived at in accordance with Clause 10.2, the Committee shall not be required to conduct any further inquiry.
4. Similarly, where the Complainant does not opt for settlement through conciliation or in the event the Complainant informs the Committee that the terms and conditions of the settlement arrived at have not been complied with by the Accused, the Committee shall proceed to make an inquiry in the manner as set out hereunder:
  - (a) The Committee shall conduct an investigation and shall hold meetings with the Complainant and record his or her statements in this regard. In addition, the Complainant may submit any documentary proof, adduce evidence and call witnesses, if he or she so desires.
  - (b) If the Complainant so desires, he or she may be accompanied by a representative.
  - (c) The Accused shall be given a fair and reasonable opportunity to present his or her case, to call for his or her own evidence, to inspect the documents and records produced as evidence, and to cross-examine the witnesses.
  - (d) During the course of inquiry, the Committee shall communicate its findings and provide the Complainant and the Accused with a copy of the Committee's findings. In addition, both the parties shall be given an opportunity to make representations against such findings.



- (e) The investigation shall be completed at the earliest and in any event, it should be concluded within a maximum period of ninety (90) days from the date of the initiation of the inquiry.
  - (f) Once the hearing before the Committee is over, the Committee shall prepare a report of its findings and forward a copy of the report to IG within ten (10) days from the date of completion of the hearing. A copy of the report shall also be made available to the Complainant and the Accused.
- 5. During the pendency of the inquiry, on a written request made by the Complainant, the Committee may recommend the transfer of the Complainant or the Accused to any other workplace, or grant leave to the Complainant for a period of up to three (3) months (such leave shall be in addition to the leave entitled as per the leave policy of IG), or grant such other relief as may be prescribed under applicable law. The HR Department shall promptly implement such recommendation of the Committee and send a report evidencing the implementation of such recommendation to the Committee.
- 6. If the inquiry does not establish occurrence of sexual harassment, no action is required to be taken in relation to the complaint.
- 7. If the inquiry does establish occurrence of sexual harassment, the Committee shall in its inquiry report recommend the necessary action to be taken which the Committee deems fit, on a case-by-case basis, in the best interest of the Complainant. The Committee shall record its reasons in writing. The actions to be recommended by the Committee are as follows:
  - (a) a written warning that shall be placed in the personal file of the Accused;
  - (b) reduction in rank of the Accused;
  - (c) deduction/payment of such compensation as it may consider appropriate to be paid to the Complainant or to his or her legal heirs;
  - (d) stoppage of increment;
  - (e) transfer of service;
  - (f) dismissal from service; or
  - (g) any other action that the Committee may deem fit.
- 8. On receipt of the inquiry report from the Committee with the aforesaid recommended actions, the HR Department shall act upon the recommendation within sixty (60) days of its receipt.
- 9. If the complaint is against a senior member of IG or any member of the Committee, then the Complainant may approach the Local Complaints Committee constituted under the Act, if applicable.
- 10. All inquiry proceedings shall be documented in a standardized format, ensuring transparency, consistency, and auditability.
- 11. The Committee shall track and disclose anonymized data such as number of inquiries completed within 90 days, types of resolutions recommended, and systemic improvements suggested, as part of IG's internal monitoring and external ESG/social disclosures.
- 12. Where third-party stakeholders (vendors, contractors, consultants, logistics providers) are involved as Complainants or Respondents, the inquiry shall extend to them under the same standards of fairness, confidentiality, and timelines.
- 13. The ICC shall conduct a post-inquiry review with HR and senior leadership to identify systemic gaps (e.g., lack of awareness in a department, vendor-related risks) and recommend preventive measures.
- 14. All inquiry members shall undergo regular refresher training on investigation skills, sensitivity, and confidentiality obligations, with training records maintained by HR.

## **11 Victimisation/Retaliation**

1. IG prohibits retaliatory actions against anyone who, in good faith, raises concerns or questions regarding ethics, discrimination or harassment matters, or reports suspected violations of other applicable laws, regulations or policies.
2. The team leader or the human resources representative must be vigilant towards any possible retaliatory actions. The Complainant should communicate any retaliatory action to the team leader or the human resources representative or directly to the Committee. Where the Complainant has not communicated such action directly to the Committee, the team leader or the human resources representative shall immediately communicate any complaints of retaliatory action received by it to the Committee.
3. Where the retaliatory action is established, the Committee may recommend the transfer of the alleged Accused or the Complainant to avoid any further act of victimisation. The Committee may also recommend appropriate disciplinary action against such retaliatory action.
4. HR shall conduct a follow-up review within three (3) months of closure of a case to confirm that no victimisation has occurred. Retaliation may also be reported anonymously through established whistleblowing mechanisms.

## **12 False Complaints**

1. If on investigation it is revealed that the complaint was made with a malicious intent or the Complainant made the complaint knowing it to be a false complaint, the Committee shall take appropriate disciplinary actions against the Complainant.
2. However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. Further, malicious intent on the part of the Complainant shall be established after conducting an inquiry, before recommending any action.
3. The Committee shall record in writing the reasons for determining malicious intent, ensuring fairness and transparency.

## **13 Appeals**

1. In case the Complainant or the accused is aggrieved from the decision of the Committee or in case of non-implementation of the recommendation of the Committee, such aggrieved person may prefer an appeal to the appropriate court/tribunal as may be prescribed under applicable law having jurisdiction over such matters within ninety (90) days from the date of receipt of decision of the Committee.
2. Both parties shall be informed in writing of their right to appeal and the applicable authority/procedure.

## **14 Confidentiality**

1. Publishing/communicating or in any other manner making known to the public, press or media any information in relation to the contents of the complaint, the identity and addresses of the Complainant, Accused and witnesses, the conciliation and inquiry proceedings, recommendations of the Committee, or the action taken by IG is prohibited. Such prohibition however, does not apply to information regarding the justice secured with respect to the Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed.

2. Any person entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under Part I of this Policy, contravenes or violates the provisions of Clause 14.1, shall be subjected to suitable action in this regard.
3. Confidentiality obligations extend to external parties such as contractors, vendors, and consultants where they are involved in a case. IG shall maintain a secure repository (digital/physical) with restricted access for records.

## **15 Training**

1. IG shall conduct periodical training sessions for the members of the Committee and shall spread awareness by organising workshops and awareness programmes at regular intervals for sensitising the Employees. In addition, IG shall conduct orientations for the Committee members in accordance with the provisions of the Act (where so ever applicable) and Part I of this Policy.
2. IG shall conduct regular orientation and training sessions for its Employees.
3. Wherever possible, the local non governmental organisation's working in the relevant field shall assist IG in these training sessions.
4. It shall be mandatory for all the Employees to attend the training session.
5. IG shall maintain training records (date, content, participants, coverage %) and review training effectiveness. Refresher training for Committee members shall be conducted at least once every two (2) years. Awareness sessions will also extend to contract staff, interns, and relevant third-party workers.

## **16 Approval**

This Prevention of Sexual Harassment (POSH) Policy has been formally reviewed and approved by:



Managing Director, IMIL

## 17 Declaration

Name:

Date:

Ps.No :

To,

The compliance Officer,

Sub: Sexual Harassment Prevention Policy – Undertaking – Reg.

I, Undersigned, hereby certify that:

1. Have received the Sexual Harassment Prevention Policy ('Policy') and undergone training program.
2. Agree to abide by the policy of the company, and

Yours Truly,

### **History of Modification**

<b>Modification</b>	<b>Date of dd/mm/yy</b>	<b>Contents of modification</b>
00	26/08/2013	New release
01	10/09/2024	9.2 clause addition
02	14/09/2024	NGO- Mobile No. included
03	14/08/2025	Policy revisited and updated as per ESG Requirement