

## **WHEELS INDIA LTD**

### **Gender-Neutral Policy on Prevention of Sexual Harassment at Workplace**

#### **1. Objective**

The objective of this policy is to foster a workplace that is safe, dignified, and free from any form of sexual harassment, irrespective of gender identity, sexual orientation, or role in the organisation. WHEELS INDIA LTD is committed to upholding principles of equality, inclusivity, and respect, thereby enabling all employees, trainees, interns, consultants, vendors, clients, and associates to work without fear of harassment or intimidation.

#### **2. Scope and Applicability**

- This policy applies to **all employees** (permanent, temporary, ad hoc, contractual), **consultants, interns, apprentices, vendors, service providers, clients, visitors** or any person associated with the WHEELS INDIA LTD.
- The policy covers incidents occurring:
  - **Within the workplace premises** (office, factories, branches, plants, retail outlets, etc.).
  - **During work-related travel, training, meetings, conferences, social gatherings** (official or semi-official).
  - **In virtual/online spaces** (emails, social media, messaging apps, video calls used for work purposes).
  - **Outside office hours** if such conduct affects the work environment, safety, or dignity of any individual.

#### **3. Definition of Sexual Harassment (Gender-Neutral)**

Sexual harassment includes any unwelcome, sexually coloured behaviour (directly or by implication), physical, verbal, non-verbal, or written conduct that creates a hostile, intimidating, or offensive environment. This includes but is not limited to:

- **Physical Conduct:** Unwelcome touching, hugging, patting, stroking, kissing, invasion of personal space, physical assault, or coerced sexual acts.
- **Verbal Conduct:** Comments on body, appearance, gender identity, sexual orientation, or private life; sexually suggestive jokes, remarks, or innuendos; persistent unwelcoming invitations or propositions.

- **Non-Verbal/Visual Conduct:** Leering, staring, gestures, displaying sexually implicit/explicit material, offensive images or messages (digital or physical).
- **Online Harassment:** Inappropriate messages, texts, memes, images, or videos sent via official or personal channels that affect the professional environment.
- **Retaliatory Harassment:** Any adverse treatment, threat, or reprisal because an individual refused or reported such conduct.

#### **4. Policy Declaration**

- WHEELS INDIA LTD has a **Zero Tolerance** for sexual harassment in any form, against any individual, regardless of gender, sexual orientation, or position held.
- All complaints will be taken seriously, dealt with promptly, and investigated fairly and confidentially.
- The dignity and privacy of the complainant, respondent, and witnesses will be respected at all times.

#### **5. Internal Committee (IC)**

In compliance with the **PoSH Act, 2013** (India), WHEELS INDIA LTD shall constitute an **Internal Committee (IC)** to address complaints of sexual harassment.

- The IC will consist of:
  - **Presiding Officer:** A senior woman employee.
  - **Two or more members:** From among employees, with experience in social work/legal knowledge.
  - **External Member:** From an NGO or an individual familiar with issues relating to sexual harassment and gender diversity.
- While the law mandates a woman Presiding Officer, this organisation recognises **all gender identities as eligible complainants and respondents.**

#### **6. Complaint Mechanism**

- **Mode of Complaint:** Complaints can be made in writing (email/letter) or electronically. Assistance will be provided if the complainant is unable to draft it.
- **Timeframe:** Complaints should be filed within 3 months of the incident (extendable by IC if sufficient cause is shown).

- **Third-Party Complaints:** Complaints may also be filed by a colleague, friend, family member, or witness if the individual is unable to do so themselves.

## **7. Inquiry Procedure**

- **Preliminary Assessment:** The IC will acknowledge receipt and conduct an initial assessment.
- **Conciliation:** At the request of the complainant, conciliation may be attempted without monetary settlement.
- **Formal Inquiry:** Conducted in accordance with principles of natural justice:
  - Both parties shall be given equal opportunity to present evidence, witnesses, and statements.
  - Proceedings will remain confidential.
  - Interim relief measures (e.g., transfer, leave, reporting change) may be recommended by the IC.
- **Report & Recommendations:** IC will submit its findings to the Employer within 10 days of completing the inquiry.
- **Disciplinary Action:** May include written apology, warning, counselling, suspension, termination, or other actions per service rules.

## **8. Protection Against Victimisation**

- Retaliation or intimidation against complainants, witnesses, or IC members is strictly prohibited.
- Any such act will invite strict disciplinary action.

## **9. Awareness & Training**

- The organisation shall regularly conduct **gender-sensitisation and PoSH training programmes** for employees, managers, and IC members.
- Policy will be displayed at prominent places in the office and shared with all stakeholders.

## **10. Confidentiality**

- All proceedings, identities, and records related to complaints will be kept strictly confidential, except where disclosure is legally mandated

## **11. False/Malicious Complaints**

- Malicious or knowingly false complaints will invite disciplinary action.
- However, inability to prove allegations does not automatically mean the complaint was false.

## **12. Employer's Responsibilities**

- Provide a safe, inclusive, and respectful working environment.
- Ensure timely constitution of IC as per law.
- Provide all assistance to the complainant, respondent, and IC during inquiry.
- Implement IC recommendations in good faith.

## **13. Policy Review**

This policy will be reviewed periodically (at least once every three years) to ensure continued relevance, legal compliance, and alignment with best practices on workplace safety and inclusivity.

**Policy Enacted on : 15/12/2025**