

		Policy Name Prevention of Sexual Harassment at the Workplace	Section 1.3	Total Pages 7
SKF in India Human Resource			Edition No. 11	Date 01/01/2020
HB	Employee Policy		Approved By Director - HR	Issued By HR

1. PHILOSOPHY

Providing a safe and congenial work environment to all employees is an integral part of SKF's employment policy. SKF is committed to maintain a working environment in which Employees, can work together, free of gender violence, sexual harassment, and discrimination on the basis of sex/gender. SKF expects responsible and dignified conduct and behaviour on part of all the employees across levels.

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, has been effective from 9th December 2013. In compliance with said Act, the existing "Policy for Prevention of Sexual Harassment" has been updated, to cover all the stipulated provisions, so that the objectives are met with.

Further, SKF will address this policy as gender-neutral to take care of exceptional cases of other genders.

2. APPLICABILITY

This policy extends to all employees of SKF in India in respect of acts of sexual harassment and inappropriate conduct occurs to the employee at the workplace and in the course of employment.

In case of any ambiguity in the policy or in the actual proceeding, the preamble and provisions of the Act will be construed as conclusive.

3. OBJECTIVE

- a) To promote safe, equal and congenial working environment;
- b) To preserve and enforce the Right of Gender Equality, for providing protection against Sexual Harassment at Workplace and during the course of employment;
- c) To evolve a permanent mechanism for the prevention and formal addressal of sexual harassment cases;
- d) Define and clarify the implications and outcomes of confirmed sexual harassment;
- e) To promote a social and psychological environment to create awareness about sexual harassment in its various forms.

4. DEFINITIONS

4.1 'Employee' means regular, temporary, ad hoc employees, individuals engaged on daily wage basis, either directly or through an agent, contract labour, co-workers, probationers, trainees, and apprentices, with or without the knowledge of the principal employer, whether for remuneration or not, working on a voluntary basis or otherwise, whether the terms of employment are express or implied.

4.2 'Sexual Harassment' mean and include but not limited any of the following:

- a) Unsolicited, unwelcome sexually determined behaviour or acts such as physical contact and advances, requests or demand for sexual favours, either explicitly or implied (i.e. by words or actions), in return of employment, promotion, examination or evaluation of person towards any activity; or will create hostile working environment or an adverse consequences will arise if the victim does not consent to the conduct in question or raises any objection there to;
- b) Unwelcome sexually determined behavior including sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication, have the purpose and /or effect of interfering with a employees's work or academic performance or of creating an intimidating, hostile or offensive employment, living environment which offends the individual's sensibilities and affect her/his performance, health and safety
- c) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy by inquiries into the private life and persistently asking them for their company;

4.3 'Workplace' means Company's establishments or factory or location or building which is employee's place of employment.

- a) Any premises visited by the employee for discharge of her duties including the transportation provided by the Company.
- b) Any place where the employee is present in a work related context including training programmes, conferences, work related functions, office parties, business or field trips places where there is interaction with clients, customers and other service providers.

5. INTERNAL COMMITTEE

5.1 Composition

The Internal Committee which will shall be constituted at all administrative units and offices of the employer will (hereinafter referred as 'Committee') consist of:

- a) Chairperson shall be women employed at senior level. If senior level woman employee is not available then a woman chairperson shall be nominated from other offices or units of the employer
- b) No less than two members having legal knowledge
- c) One half of the total members so nominated shall be women
- d) One member from NGO or associations committed to cause of women or person familiar with issues relating to sexual harassment

The Committee Composition for each location of the Company is annexed to this Policy as '**Annexure A**'.

Any change in the members of Committee would be communicated to all employees to whom this policy is applicable.

The members will hold membership for period of 3 years.

5.2 Meeting of Committee

There should be minimum four meetings of the committee in each year , recommended least one in each quarter.

A quorum of three members of the Complaint Committee is required to be present to conduct the proceedings (inquiry/Investigation). Out of which one should be chairperson and at least one shall be women member out of other two.

5.3 Powers of Committee

- a) To take cognizance of complaints about sexual harassment, conduct enquiries provide assistance and redressal to the Complainant/ aggrieved person recommend penalties and take action against harasser if necessary.
- b) To enforce attendance of people involved in the case of any one who can provide information regarding the case.
- c) To conduct an enquiry as per the provisions of service rules
- d) Recommend appropriate action in accordance with the disciplinary actions mentioned in this policy.
- e) To seek medical, police and legal intervention with the consent of the complainant as may require.
- f) To make arrangements for appropriate psychological, emotional and physical support (in the form of counselling, security and other assistance) to the victim if s/he so desires.
- g) The enquiry will be conducted in accordance with the principles of natural justice.

6. COMPLAINT REDRESSAL PROCESS

6.1 Any employee who feels or is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing by letter or email to posh.india@skf.com within 3 months of occurrence of the last incident.

If the aggrieved cannot make a complaint in writing, any Member of the committee shall be required to have assistance rendered to make the complaint.

Provided the Committee may extend time limit, on reasonable grounds which prevented the employee from filing a complaint within the prescribed period.

The committee will maintain register of complaints received.

6.2 The Committee will hold a meeting with the Complainant within 5 working days of the receipt of the complaint, but no later than a week in any case.

6.3 The Committee members shall hear the Complainant and record her/his allegations.

The Complainant can also submit any corroborative material along with a documentary proof, oral or written material, etc., to substantiate his / her complaint.

If the Complainant does not wish to depose personally due to embarrassment of narration of event, a female officer for female employees involved and a male officer for male employees, involved shall meet and record the statement.

6.4 The person against whom complaint is made may be called for appearance before the Committee for testifying and an opportunity will be given to him / her to give an explanation. Based on proceedings, an "Enquiry" shall be conducted.

6.5 The committee on the findings give its report to the Employer with recommendations within ten days of completion of enquiry. The Employer will take appropriate disciplinary action based on the recommendations provided by the Committee. The decision of Employer will be final and binding.

6.6 The entire process will be concluded in maximum of 90 days of reporting of the complaint.

6.7 If the complaint is not a matter of sexual harassment, it may be dismissed and the decision is to be documented.

6.8 In case, the complaint is found to be false, the management may take appropriate disciplinary action, based on the report of the Committee.

6.9 The employer shall act upon the recommendation of the committee within 60 days of receipt of report.

7. ENQUIRY PROCESS

- 7.1 The Committee shall prepare and hand over the copy of the complaint to the person against whom complaint is made. An opportunity to submit a written explanation if she / he so desires within 10 days of receipt of the same.
- 7.2 A copy of written explanation given by the person, against whom complaint is made, shall be provided to the Complainant on its receipt.
- 7.3 The Complaint Committee will provide an opportunity to call for any documents and/or any witness/es, to the parties of Compliant.
- 7.4 The parties of the Complaint shall provide name of witness/es to be called and original copies of documents. The parties shall affix his / her signature on the respective documents to certify these to be original copies.
- 7.5 The Committee shall call upon all witnesses mentioned by both the parties and provide every reasonable opportunity of being heard.
- 7.6 During pendency of an enquiry the committee can recommend the following to the employer based on the request by the aggrieved:
- Transfer the aggrieved or the respondent to any other workplace,
 - Grant leave to the aggrieved up to a period of 3 months (this shall be in addition to the leave entitled otherwise)
 - Grant such other relief as may be prescribed
- 7.7 The Committee based on enquiry and findings give its report to the Employer and both the parties with recommendations within 90 days of commencement of enquiry.

The Employer will take appropriate disciplinary action based on the recommendations provide by the Committee.

- 7.8 If the committee arrives at the conclusion that the allegation against the respondent is malicious or the complaint has been made knowing it to be false or either parties has produced any forged or misleading documents , the committee can recommend to the Employer to take disciplinary actions as prescribed.

8. DISCIPLINARY ACTION

Disciplinary action may include verbal/written warning, transfer, withholding promotion/increment, suspension or dismissal. This action shall be in addition to any legal action recommended by the Committee.

9. CONFIDENTIALITY

All information received by the Committee shall be kept confidential. The identities of the Complainant and all witnesses shall throughout be protected and kept confidential by the Committee.

10. DISSEMINATION OF POLICY

The policy will be displayed at all office locations and published on SKF India Portal

New recruits will undergo awareness sessions during the Induction program

Online awareness training sessions will be given to all employees at regular intervals

Policy Change Log

Edition No	Change Proposed	Reviewed by	Approved by	Approval Date
9	Reviewed as part of the Policy renewal exercise. Name of new committee members updated.	Manish Gupta, Manager - Compensation & Benefits and HR SSC	Anjali Byce, Director - HR	January 1, 2019
10	Name of committee members updated.	Dhara Mody, HR Partner – Industrial Sales	Bharati Deshpande, General Manager – Internal Audit	March 1, 2019
11	Name of committee members updated. Resigned members removed.	Dhara Mody, HR Partner – Industrial Sales	Bharati Deshpande, General Manager – Internal Audit	January 1, 2020
12	SKF India Limited and Lincoln Helios India Limited Committee structure updated.	Dhara Mody, Deputy Manager, Human Resources	Ranjan Kumar	February 10, 2020

Prevention of Sexual Harassment at the Workplace: Internal Committee for POSH

Any employee who feels or is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing by letter or email to posh.india@skf.com within 3 months of occurrence of the last incident.

Given below is the list of POSH committee members for SKF In India:

SKF India Limited

Region	Sr. No	Location	Nature of location / no. of employees	ICC Members / tenure				
				Presiding Officer	External Member	Member	Member	
West	1	Pune	Factory + Corporate office + DC	Ms. Sangita Soman (sangita.soman@skf.com)	Ms. Pallavi Poswal (POSH At Work)	Mr. Jacob Verghese (jacob.verghese@skf.com)	Ms. Deeksha Hapawat (Deeksha.Hapawat@skf.com)	Ms. Mayuri Kulkarni (mayuri.kulkarni@skf.com)
	2	Mumbai	Office					
	3	Ahmedabad	Office / DC					
	4	Employees Located at other locations in the West region						
North Region	5	Gurgaon	Office	Ms. Aparna Srivastava (Aparna.Srivastava@skf.com)	Ms. Pallavi Poswal (POSH At Work)	Mr. Gautam Kumar (Gautam.Kumar@skf.com)	-	Ms. Mayuri Kulkarni (mayuri.kulkarni@skf.com)
	6	Manesar	Solution Factory					
	7	Haridwar	Factory					
	8	Employees Located at other locations in the North region						
South Region	9	Chennai	Office	Ms. Bhavna Panigrahi (bhavna.panigrahi@skf.com)	Ms. Pallavi Poswal (POSH At Work)	Mr. Gautam Kumar (Gautam.Kumar@skf.com)	-	Ms. Rucha Upasani (Rucha.Upasani@skf.com)
	10	Bangalore	Factory					
	11	Employees Located at other locations in the South region						
East Region	12	Kolkata	Office	Ms. Deeksha Hapawat (Deeksha.Hapawat@skf.com)	Ms. Pallavi Poswal (POSH At Work)	Mr. Gautam Kumar (Gautam.Kumar@skf.com)	-	Mr. Rahul Sah (Rahul.Sah@skf.com)
	13	Jamshedpur	Solution Factory					
	14	Employees Located at other locations in the East region						

Policy Change Log

Edition No	Change Proposed	Reviewed by	Approved by	Approval Date
1	Creation of separate document for Committee Members and Name of committee members updated	Dhara Mody People Business Enabler – Industrial & Lubrication Business	Ranjan Kumar	25 th July 2022
2	Creation of separate document for Committee Members and Name of committee members updated	Dhara Mody People Business Enabler – Industrial & Lubrication Business	Ranjan Kumar	October 2022
3	Creation of separate document for Committee Members and Name of committee members updated	Mayuri Kulkarni Assistant Manager- Secretarial & Compliance	Ranjan Kumar	20 th June 2023