

Sexual Harassment Policy (PoSH) in Wardwizard Innovations & Mobility Limited

1.0 POLICY

1.1 Our Company M/s. Wardwizard Innovations & Mobility Limited is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

The Company is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourage equality of opportunity.

The Company will not tolerate any form of Sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

2.0 SCOPE AND EFFECTIVE DATE

2.1 This Policy applies to all categories employees of the Company, including permanent management and workmen, temporary workmen, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by client or by suppliers or any other business associates.

The Workplace includes:

- a. All offices / factory or other premises where the Company's business is conducted.
- b. All company related activities performed at any other site away from the Company's premises.
- c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

2.2 Sexual harassment would mean and include any of the following:

- a. Sexual harassment may be one or a series of incidents including unsolicited and unwelcome sexual advances, request for sexual favors, or any other verbal or physical conduct of sexual nature.

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001 (Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in **Website** - www.wardwizard.in **Tel No.** - +91 9727755083



**ward
wizard**

Innovations & Mobility Limited
(Formerly known as Manvijay
Development Co. Ltd.)

An ISO 9001 : 2015 Company

- b. unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- c. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored 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 which offends the individual's sensibilities and affect her / his performance;
- d. eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- e. act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- f. conduct of such an act at work place or outside in relation to an Employee of TPC, or vice versa during employment; and
- g. any unwelcome gesture by an employee having sexual overtones,
- h. verbal abuse or joking that is sex oriented,

2.3 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

3.0 COMPLAINT REDRESSAL COMMITTEE

3.1 The Company has instituted a Complaints Committee for redressed of sexual harassment complaint (made by victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following members out of which Minimum 3 members will be Female:

Internal Committee:

1. Chair Person – Ms. Sheetal Bhalerao
2. Member – Ms. Sneha Shouche
3. Member – Mr. Kameshwar Singh
4. Member – Mr. Ravindran Nambiar

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001 (Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in Website - www.wardwizard.in Tel No. - +91 9727755083



**ward
wizard**

Innovations & Mobility Limited
(Formerly known as Manvijay
Development Co. Ltd.)

An ISO 9001 : 2015 Company

5. Concerned Ethics Officer – Ms. Shital Upadhyay

3.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

The Complaints Committee is responsible for:

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

4.0 REDRESSAL PROCESS

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

- 4.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- 4.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 4.3 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 4.4 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material 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 lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001(Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in **Website** - www.wardwizard.in **Tel No.** - +91 9727755083

4.6 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

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

5.0 ENQUIRY PROCESS

5.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

5.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.

5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

5.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/whom they propose to call.

5.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

5.6 The Committee shall call upon all witnesses mentioned by both the parties.

5.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

5.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HEAD - HR. The report of the committee shall be treated as an enquiry report based on which an erring employee can be awarded appropriate punishment straightaway.

5.9 The HEAD - HR will direct appropriate action in accordance with the recommendation proposed by the Committee.

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001 (Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in **Website** - www.wardwizard.in **Tel No.** - +91 9727755083



**ward
wizard**

Innovations & Mobility Limited
(Formerly known as Manvijay
Development Co. Ltd.)

An ISO 9001 : 2015 Company

5.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later.

6.0 OTHER POINTS TO BE CONSIDERED

6.1 The Committee may recommend to the HEAD - HR action which may include transfer or any of the other appropriate disciplinary action.

6.2 The management shall provide all necessary assistance for ensuring full, effective and speedy implementation of this policy.

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

6.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to Management.

6.5 In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

7.0 CONFIDENTIALITY:

The Company understands 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 any investigatory process to the extent practicable and appropriate under the circumstances.

8.0 ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, result of investigations and other relevant material will be kept confidential by the Company except where disclosure is required disciplinary or other remedial process.

9.0 PROTECTION TO COMPLAINANT / VICTIM

The Company 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.

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001 (Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in **Website** - www.wardwizard.in **Tel No.** - +91 9727755083



**ward
wizard**

Innovations & Mobility Limited
(Formerly known as Manvijay
Development Co. Ltd.)

An ISO 9001 : 2015 Company

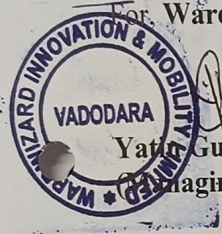
The Company will ensure that victim or witnesses are not victimized or decimated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure will be subject to disciplinary action.

10.0 CONCLUSION:

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

For, **Wardwizard Innovations & Mobility Limited,**



[Signature]
Yatin Gupte
(Managing Director)

02/07/21

CIN NO. - L35100MH1982PLC264042

Registered office address - 401, Floor-4, 23/25, Dhun Building, Janmabhoomi Marg, Horniman Circle, Fort, Mumbai- 400001 (Maharashtra), India

Corporate Office - C-222, GIDC Makarpura Industrial Estate, Vadodara - 390010, Gujarat, India

Email id - compliance@wardwizard.in Website - www.wardwizard.in Tel No. - +91 9727755083