



AMBA AUTO SALES AND SERVICES LIMITED

(Formerly known as Amba Auto Sales and Services Private Limited)

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(Authorised Dealer of Bajaj Auto Limited)

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Amber Auto Sales And Services Limited is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

Amber Auto Sales And Services Limited will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

The Policy for Prevention of Sexual Harassment was constituted by Board of Directors at the meeting held on Tuesday 1st July, 2025 in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

SCOPE :

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by supplier or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is located.
2. All Company related activities performed at any other site away from the Company's premises.
3. Any social, business or other functional where the conduct or comments may have an adverse effect on the workplace

or workplace relations.

Definition of sexual harassment:

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

- (i) Physical conduct or advances; or
- (ii) A demand or request for sexual favours; or
- (iii) Making sexually coloured remarks; or
- (iv) Showing pornography; or
- (v) Any other unwelcome physical, verbal or non-verbal conduct of sexual natures.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually- suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their gender and of the gender of the harasser. Amba Auto Sales

And Services Limited recognizes that sexual harassment may also occur between people of the same gender. What matters is that sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Amba Auto Sales And Services Limited recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of Amba Auto Sales And Services Limited, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

Any act of sexual harassment is prohibited whether it takes place within Amba Auto Sales And Services Limited premises or outside, including at social events of the Company business trips, training sessions or conferences sponsored by Amba Auto Sales And Services Limited.

Internal Complaints Committee (“ICC”)

- a. To enquire and advice suitable action on the complaints on Sexual Harassment, there shall be a Committee called “Amba Auto Sales And Services Limited - Internal Complaints Committee”. The Committee shall be constituted by Chairman and Managing director with the following members: A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the Employees;
- b. Not less than 2 (two) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c. One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total Members so nominated shall be women.

The ICC will operate on the following guidelines:

- a. Every Complaint received shall be forwarded to the Amba Auto Sales And Services Limited - Internal Complaints Committee for investigation, inquiry.
- b. The Committee members on a need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.
- c. The person against whom the allegation of Sexual Harassment has been made by the aggrieved person, the ICC shall meet as and when any instance of violation of the policy is referred to the committee and, in any case, at least once in a year.
- d. ICC shall prepare the annual report and submit the report pertaining to number of cases filed and their disposal under the act to the board.
- e. The presiding officer and the members of the ICC will hold the position upto three years from the date of their nomination.

Complaints Redressal Mechanism

1. Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to ICC within a period of three months from the date of incident and in case of a series of incidents, within a period of

three months from the date of last incident, which may further be extended for a period not exceeding three months by ICC by recording the reasons in writing, if circumstances were such which prevented the aggrieved from filing a complaint within the said period.

2. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of ICC shall render all reasonable assistance to the aggrieved for making a complaint in writing.
3. Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, (a) legal heir or friend; or (b) coworker; or (c) an officer of the National Commission for Women or State Women's Commission; or (d) any person who has knowledge of the incident, with a written consent of the aggrieved women; may make a complaint.
4. The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.
5. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the ICC along with supporting documents and names and address of witnesses.
6. On receipt of such complaint, ICC shall provide a copy of such complaint along with supporting documents to the Respondent within 7 working days.
7. Respondent shall file reply to the complaint along with their list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents from ICC
8. ICC shall investigate the complaint in detail by giving reasonable opportunities for both the parties. For the purpose of making an inquiry, under this policy, ICC have the power of a civil court, vested in it, in respect of:
 - a. Summoning and enforcing the attendance of any person and examining him/her under oath;
 - b. Requiring discovery and production of documents;
 - c. Any other prescribed matter.
9. During the enquiry process, the Complainant and the Respondent shall refrain from any form of threat, intimidation or influencing of Witnesses
10. The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses.
11. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
12. The ICC must complete its investigation within a period of 90 days.
13. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
14. For conducting the enquiry, the quorum of Amba Auto Sales And Services Limited - Internal Complaints Committee shall be of 3 members including the presiding officer.
15. The ICC may before initiate an enquiry, and at the aggrieved party's request, attempt to settle the matter between them through conciliation. However, it shall ensure that:
 - a. No monetary settlement made as a basis of conciliation.
 - b. Where a settlement has been arrived, the ICC record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. A copy of the same shall be provided to the aggrieved and the respondent. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.
16. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:
 - a. To transfer the aggrieved person or the respondent to any other workplace
 - b. Grant leave to the aggrieved person, up to three months with salary which is in addition to leave to which he/she is otherwise entitled

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat

to work in the work place

Informal complaints mechanism

If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped
- ensure that the above is done speedily and within 7 days of the complaint being made

Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal investigator in accordance with this policy.

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.-an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that all the records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 7 days of the complaint being made

Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the Company. They can do so through labour court or judicial court.

Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the

following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

FALSE ALLEGATION:

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. On inquiry, if the ICC intent has to be established after an enquiry in accordance with the procedure prescribed, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence or produced forged or misleading documents
3. The above provision is not to discourage employees from coming forward with complaints. ICC recognizes and expects certain claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations

Implementation of this policy

Amba Auto Sales And Services Limited will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, Amba Auto Sales And Services Limited - Internal Complaints Committee will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Awareness

Awareness program to be organized to:

- a. Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- b. Carry out orientation programs and seminars for the members of the internal committee.
- c. Conduct capacity building and skill building programs for the members of the ICC.
- d. Declare the names and contact details of all members of the ICC.

- e. Use modules developed by the State Governments to conduct workshops and awareness programs for familiarizing the employees with the provisions of the act.

Monitoring and evaluation

1. Company with the approval of the Competent Authority may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies the Act.
2. Any such alteration or amendment or rescinding will be intimated to the employees.
3. Nothing contained in these Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
4. The ICC shall prepare an annual report with the following details and shall submit the same to the Management to include in its annual report:
 - a. Number of Complaints of sexual harassment received during the year;
 - b. Number of complaints disposed of during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer;
5. The above Annual Report and the MIS should be prepared by the NICC and shall be submitted before the end of each financial year to the Senior Management of the Company.

CONCLUSION:

Amba Auto Sales And Services Limited - Internal Complaints Committee recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available

Effective Date

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

Policy Review

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

Disclosures

The Company shall disclose the Policy on its website.

For Amba Auto Sales and Services Limited

Sd/-

Rakesh Kumar Lohia
Managing Director
DIN: 01884538