

DYNA K AUTOMOTIVE STAMPINGS PVT.LTD.

PUNE

POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE

CONTENT

1. OBJECTIVE & SCOPE

2. POLICY DEFINITIONS

3. COMPLAINT MECHANISM

Internal Complaints Committee (ICC)

Redress Process

Enquiry Process

4. PROCEDING AND DISCIPLINARY ACTION

5. OTHER POINTS TO BE CONSIDERED

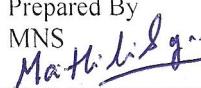
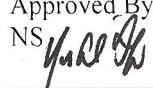
6. CONFIDENTIALITY

7. PROTECTION AGAINST RETALIATION

8. DOCUMENTATION

9. COMPLAINTS MADE WITH A MALICIOUS INTENT

10. DISSEMINATION OF THE POLICY

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1. OBJECTIVE:

DYNA-K Automotive Stamping Pvt. Ltd ("Dyna-K" or "Company") is committed to creating and maintaining a secure work environment where it's Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith all concerned should take cognizance of the fact that Dyna-K strongly opposes sexual harassment.

Such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed there under being the Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment.

Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

SCOPE:

Dyna-K's policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. Dyna-K encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties.

2. POLICY DEFINITIONS:

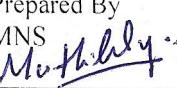
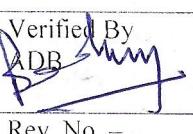
2.1 "Workplace" includes

- i. All offices or other premises where the Company's business is conducted.
- ii. All company-related activities performed at any other site away from the Company's.
- iii. 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" includes,

such unwelcome sexually determined behavior, as physical contacts and advances, sexually colored remarks, showing pornography and sexual demands whether by words, gestures or actions.

Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that his or her objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile working environment.

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Types of Sexual Harassment

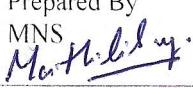
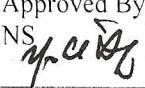
Sexual harassment includes the five basic types of unwelcome sexually determined behavior (whether directly or by implication);

1. Verbal harassment: Sexually suggestive comments, e.g., about a person's clothing, body, and/or sexual activities; sexually provocative compliments about a person's clothes or the way their clothes fit; comments of a sexual nature about weight, body shape, size or figure; comments or questions about the sensuality of a person, or his/her spouse; repeated unsolicited propositions for dates and/or sexual intercourse; continuous idle chatter of a sexual nature and graphic sexual descriptions; telephone calls of a sexual nature; verbal abuse or threats, sexual jokes; suggestive or insulting sounds such as whistling or kissing sounds etc.
2. Physical harassment: Sexual gestures, e.g., licking lips or teeth, holding or eating food provocatively, and vulgar gestures or any physical interference with normal work or movement; touching that is inappropriate at work such as patting, pinching, stroking, or brushing up against the body, mauling, attempted or actual kissing; assault, coerced sexual intercourse, attempted rape etc.
3. Visual harassment: Showing and distributing derogatory or pornographic posters, cartoons, books etc.
4. Digital/Electronic harassment: Showing / sharing / sending / distribution of any pornographic posters, written material, cartoons etc. in the form of an electronic mail, audio-visual clips etc. Any other objectionable material in electronic form which constitutes an offence under prevailing law.
5. Sexual favors: Persistent pressure for dating, unwanted sexual advances that condition an employment benefit upon an exchange of sexual favors. It is not permissible to suggest, threaten or imply that failure to accept a request for a dating encounter or sexual intimacy will affect an employee's job prospects. Also, offering benefits such as promotions, favorable performance evaluations, favorable assigned duties or shifts, recommendations or reclassifications in exchange for sexual favors is forbidden.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. It is discriminatory for instance when the victim has reasonable grounds to believe that his / her objection would disadvantage his / her in connection with his / her employment or work including recruiting or promotion or when it creates a hostile work environment.

Third party harassment:

Where sexual harassment occurs as a result of an act or omission by any third party partner or outsider vendor or any business partner or any stakeholder, the management will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

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3. COMPLAINT MECHANISM

3.1 Redress Committee

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim. Under the said Act Sec.4 stipulates constitution of Internal Complaints Committee which is to be constituted by the employer pertaining to the complaints received from female employees at the work place.

The highlighting provisions of the said section are that the Committee shall consist of members to be nominated by the employer which shall include first a presiding officer who shall be a woman employee at senior level at the work place from the employees. The other members of the committee shall be amongst the employees who are preferably committed to the cause of woman who have had experience in social work or have legal knowledge. One member shall be from the Non-Govt. organization or Association committed to the Cause of women or a person familiar of issues related with sexual harassment.

Redress Committee for 2016-17,

1	Ms. Maithili Sagar	Chairperson - Member of staff
2	Ms. Jayashree Shelar	Member 1 - Member of staff
3	Ms. Pratiksha Mandlik	Member 2 - Member of staff
4	Mr. N T Dhere	Member 3 - Member of Associates
5	Ms .Pradnya Shende	Tathapi Trust, Pune - a NGO member in a committee

As per the Supreme Court, 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 other members, one of whom shall be a lady.

3.2 If you are being harassed:

- i. Tell the accused that his / her behavior is unwelcome and ask him/her to stop.
- ii. Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- iii. File a complaint as soon as possible. If, after asking the accused to stop his / her behavior, the harassment continues, report the abuse to the Complaints Committee formed for this purpose

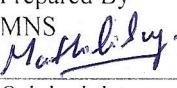
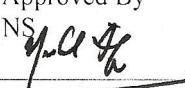
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3.3 Redress Process

- i. 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.
- ii. 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.
- iii. 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.
- iv. 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.
- v. Thereafter, the person against whom complaint is made may be called for position 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.
- vi. 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.
- vii. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

3.4 Enquiry Process

- i. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- ii. The Committee shall prepare and handover 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.
- iii. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- iv. 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/es whom they propose to call.

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- v. 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 the set to be original copies.
- vi. The committee shall arrange for a hearing meeting. Where the complainant and the person against whom the complaint is made will be heard. The Committee shall call upon all witnesses mentioned by both the parties.
- vii. 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.
- viii. 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 GM HR and Admin. The report of the committee shall be treated as an enquiry report on the basis of which an earring employee can be awarded appropriate punishment straight away.
- ix. The GM HR and Admin will direct appropriate action in accordance with the recommendation proposed by the Committee.
- x. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

4. PROCEDING AND DISCIPLINARY ACTION

Any employee found to have violated this policy shall be subject to appropriate disciplinary action according to the finding of the complaint investigation. If an investigation reveals that sexual harassment has occurred, the harasser may also be held legally liable for his or her actions under the laws.

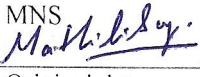
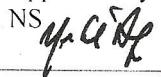
Importantly, anyone making a false claim of sexual harassment will also be subject to disciplinary action.

Any employee bringing a sexual harassment complaint or assisting in investigating such a complaint will not be adversely affected in terms and conditions of employment, or discriminated against or discharge because of the complaint. Complaints of such retaliation will be promptly and thoroughly investigated.

Further, any employee who has withheld and/or concealed information about his/her being subject to disciplinary action / being penalized / held guilty under sexual harassment at previous workplace will also be subject to disciplinary action.

Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the management shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority. The management will ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

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5. OTHER POINTS TO BE CONSIDERED

The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

6. CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

7. PROTECTION AGAINST RETALIATION

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation.

While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Redress Committee as soon as possible. Disciplinary action will be taken by the Redress Committee against any such complaints which are found genuine.

8. DOCUMENTATION

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accuser's files with the full report of the Redress Committee.

9. COMPLAINTS MADE WITH A MALICIOUS INTENT

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment.

However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant in accordance with the rules, procedures and the policies of the Company which may include transfer, withholding promotion, suspension or even dismissal.

10. DISSEMINATION OF THE POLICY

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy.

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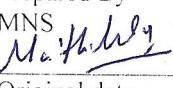
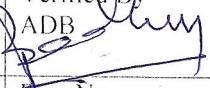
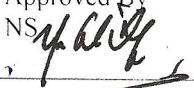
Declaration by employees of DYNK

I, _____ hereby declare that I have been given this policy to study. I have read and understood all points mentioned in this policy. I accept to abide by the DYNK Prevention of Sexual Harassment Policy completely and wholeheartedly.

Signature –

Name –

Date and Place –

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