

Document -GNA-PL-16

Rev.-01/06.02.2025

## **POSH POLICY**

### **PURPOSE:**

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013,

### **SCOPE:**

This policy applies to all categories of employees, consultants, advisers and suppliers of Guru Nanak Auto Enterprises Ltd.

### **DEFINITION:**

- a) **“Complainant”** means, in relation to a workplace, a man or a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent
- b) **“Employer”** means, and includes
  - Management
  - Any person(s) or board or committee responsible for the formulation and administration of policies that enables management, supervision and control of the workplace.
- (c) **“Employee”** includes all categories of employees of Guru Nanak Auto Enterprises Ltd. either working part-time or full time.
- (d) **“Internal Complaints Committee (ICC)”** means a Committee constituted by the employer for the purpose of dealing with all matters in relation to or connected with sexual harassment at the work place.
- (e) **“Respondent”** means a person against whom the complainant has made a complaint.
- (f) **“Sexual harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
  - Physical contact and advances; or
  - A demand or request for sexual favors; or Making sexually coloured remarks; or
  - Showing pornography; or
  - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.



### **CONSTITUTION OF COMPLAINTS COMMITTEE:**

Complaints of sexual harassment made by female employees shall be dealt with by the Internal Complaints Committee (“ICC”) In accordance with the sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Internal Complaints Committee will comprise of the following:

- a) Chairperson (Presiding Officer) – Women Staff Member
- b) Five members- Shall be amongst employees- HR Manager, Operation Head, Finance Manager, and Female Staff.
- c) Provided that at least one-half of the total Members so nominated shall be women.

### **For redressal of complaints made by a female member:**

- a) Complainant may submit a complaint in writing and inform any committee member.
- b) Complaints must be made by the complainant to any of the Committee Member of the ICC of Guru Nanak Auto Enterprises Ltd. within 3 (two) months from the date of the incident.
- c) The complaint can be made by the female complainant or any other person on behalf of the complainant
- d) Within 7 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by Guru Nanak Auto Enterprises Ltd. in order to stop the alleged act(s)
- e) Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s)
- f) Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director.

### **ROLES & RESPONSIBILITIES OF ICC:**

1. ICC shall ensure effective implementation of the Prevention of Sexual Harassment (POSH) policy of the organization.
2. ICC may at periodic intervals organize training programs on sexual harassment in conjunction with the Human Resources department.
3. ICC may at periodic intervals formulate programs for creating awareness of the policy



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amongst the employer and employees of the organization.

4. ICC shall prepare Annual Report on its functioning and submit the same to the employer every year.
5. ICC shall conduct an inquiry into complaint according to the procedures established by law.
6. ICC shall take into consideration and discuss on each and every instance of sexual harassment that the organization may have come across, including during exit interviews, gossips, rumours.
7. ICC shall recommend to the employer to take appropriate preventive steps from time to time.

**REDRESSAL:**

1. An amicable resolution of the complaint is possible only with the written consent of the complainant.
2. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
3. In case of decision establishing the offence of Sexual Harassment of the complainant, within 7 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.
4. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
5. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to
  - Warning
  - Written apology from offender
  - Transfer
  - Denial of employee benefits like increments/promotion/salary correction etc.
  - Cancellation of specific work Assignment
  - Suspension
  - Dismissal
6. Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as

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“Strictly Confidential”.

**POSH COMMITTEE**

1. Ms. Amardeep Kaur - Chairperson
2. Ms. Pratibha - Member
3. Mr. Pawan Kashyap - Member
4. Ms. Sangeeta - Member
5. Ms. Manjeet Kaur - Member
6. Mr. Kuldeep Kumar - Secretary

-SD-  
**Jagdish Singh**  
**(Chairman & Managing Director)**  
**Guru Nanak Auto Enterprises Limited**



IATF 16949 : 2016  
ISO-14001 : 2015  
ISO-45001 : 2018

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