

## NOTICE

Notice is hereby given by the company that the Sexual Harassment to Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has come into force with effect from December 9, 2013. In terms the said act, Company has formulated a Policy on Prevention of Sexual Harassment at its any workplace.

Company has also constituted an Internal Complaints Committee with the below listed members:

Ms. Rajalakshmi Narayan – Committee Head – Email ID : Rajalakshmi.Narayan@Toradex.com

Ms. Lakshmi Naidu – Member – Email ID : Lakshmi.Naidu@Toradex.com

NGO Representative – Member (will be added in due course of time) &

Mr. Vinuraj Babu – Member – Email ID : Vinuraj.Babu@Toradex.com

All employees are requested to keep the company's workplace free from sexual harassment / discrimination of every employee. However, any victim may send her complaint to the Committee Head / Members at email id mentioned or at the below mentioned address.

The policy is available with Committee Head / Members, Notice Board and also at the company's website.

  
**Sanjay Malla**  
Chief Executive Officer

July 1, 2015  
Bangalore

CC : To members of the complaint committee  
Notice boards at Bangalore, Delhi and Pune Offices.



## **POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**

### **I. COMMITMENT :**

Our company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages 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 employees are not subjected to any form of harassment.

### **II. SCOPE :**

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

The workplace includes:

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

### **III. DEFINITION OF SEXUAL HARASSMENT :**

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- unwelcome sexual advances (verbal, written or physical),
- demand or request for sexual favours,
- any other type of sexually-oriented conduct,
- verbal abuse or 'joking' that is sex-oriented,
- any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and/or submission or rejection of the conduct is used as a basis for making employment decisions.

### **IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT :**

All employees of the company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### **V. COMPLAINT MECHANISM :**

An appropriate complaint mechanism in the form of "Complaints Committee" has been created in the company for time-bound Redressal of the complaint made by the victim.





## VI. COMPLAINTS COMMITTEE :

The company has instituted an Internal Complaints Committee for Redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Internal Complaints Committee will comprise of the following members:

- Ms. Rajalakshmi Narayan – Committee Head – Rajalakshmi.Narayan@Toradex.com
- Ms. Lakshmi Naidu – Member – Lakshmi.Naidu@Toradex.com
- NGO Representative – Member &
- Mr. Vinuraj Babu – Member – Vinuraj.Babu@Toradex.com

The Internal 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.

## VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

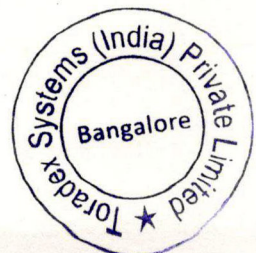

The company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

**A. Informal Resolution Options :** When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee for Redressal of their grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### B. Complaints :

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Committee Head of the Internal Complaints Committee constituted by the Management. The complaints shall have to be in writing and can be in form of letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send the complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Committee Head to contact them and take the matter forward.

2. The Committee Head of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from the receipt of the complaint.





In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Committee Head will record this finding with reasons and communicate the same to the complainant.

3. If the Committee Head of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, he / she will proceed to investigate the allegation with the assistance of the Complaints Committee.

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chief Executive Officer as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Chief Executive Officer (CEO) will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following :

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employees found guilty of the offence.

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

### **VIII. CONFIDENTIALITY :**

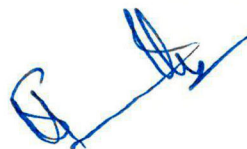
The company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

### **IX. ACCESS TO REPORTS AND DOCUMENTS :**

All records of complaints, including contents of meetings, results of investigations and other relevant materials will be kept confidential by the company except where disclosure is required under disciplinary or other remedial processes.

### **X. 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. The company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

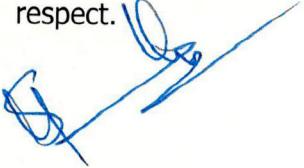


**XI. APPLICABILITY OF SEXUAL HARASSMENT TO WOMEN AT WORKPLACE (Prevention, Prohibition & Redressal) Act, 2013 :**

This policy is subject to the statutory provisions of the act.

**XII. CONCLUSION :**

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



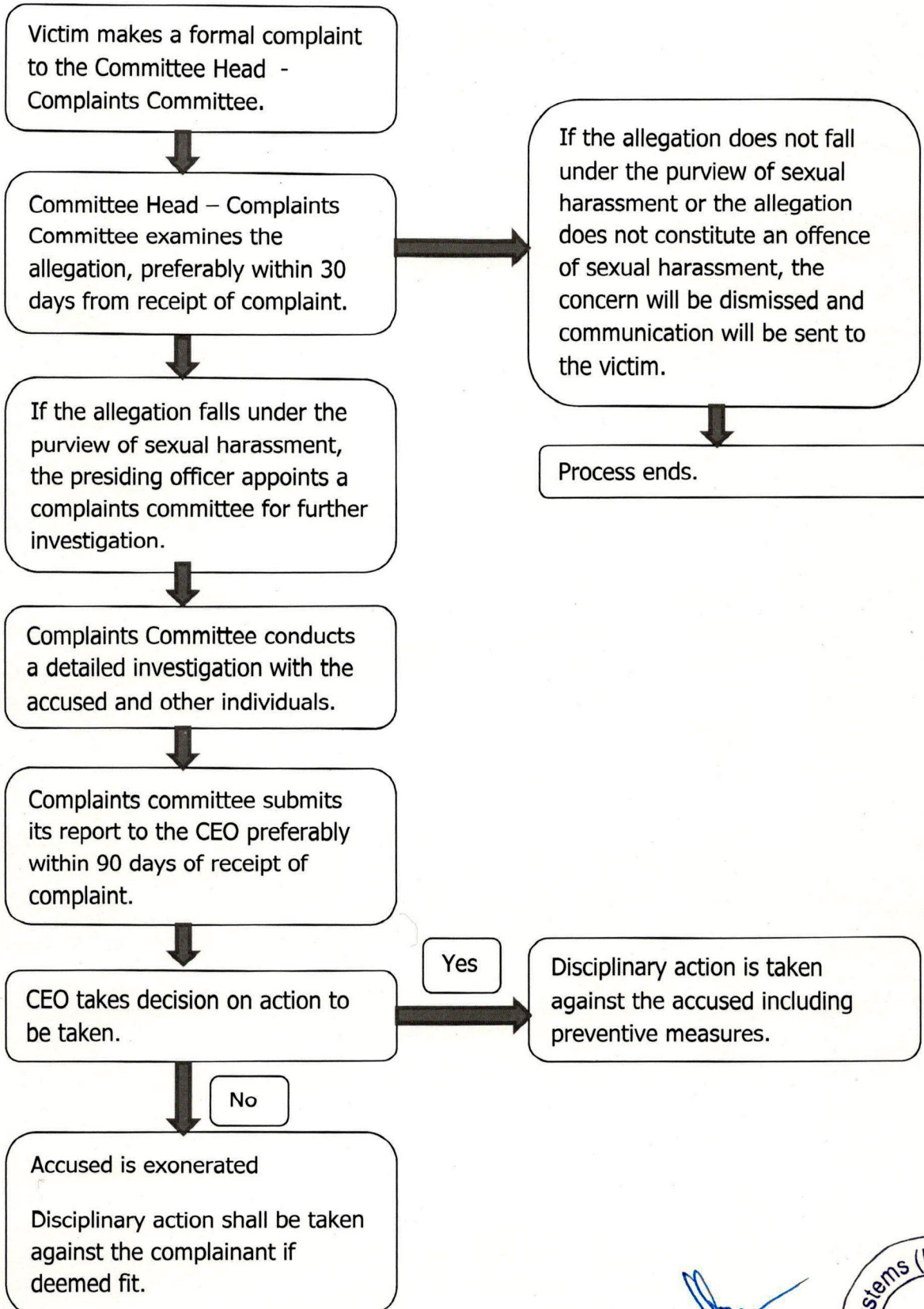
**Sanjay Malla**  
Chief Executive Officer



July 1, 2015  
Bangalore



## PROCESS FLOW



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