

Anti-Harassment and Bullying Policy

Objective

To create and maintain a workplace free from harassment and bullying based on gender, race, religion, national origin, age, sexual orientation, or other protected classifications, fostering a respectful and inclusive work environment.

Definitions

- **Company** shall mean SpeedMart (India operations).
- **Employee** includes all individuals employed by the company on a regular, temporary, ad hoc, or voluntary basis, including contractors, consultants, trainees, and probationers.
- **Employer:** The policy is applicable to SpeedMart and subsidiaries in India.
- **Harassment:** Behaviour targeting individuals based on protected classifications, adversely impacting the work environment. Harassment could be based on use of sexual innuendo, gender, race, religion, age or sexual orientation.
- **Bullying:** Repeated intentional behaviour aimed at hurting others, characterized by an imbalance of power. Can be physical, verbal, or psychological, occurring face-to-face or online.
- **Internal Complaints Committee (ICC):** A committee established to handle complaints under this policy, consisting of at least 3 members, including 2 women.

Policy Scope

Applies to all employees of SpeedMart and its subsidiaries operating in India, ensuring a harassment-free work environment.

Key Principles

- **Commitment:** Zero tolerance for harassment or bullying, ensuring respectful relationships among employees and external stakeholders.
- **Training:** Regular sessions on workplace harassment and discrimination.
- **Confidentiality:** Strict privacy maintained for all cases, with information shared only on a need-to-know basis.
- **Retaliation Prohibition:** No intimidation or harassment of individuals involved in complaints or investigations.
- **Frivolous or False Charges:** Misuse of this policy to bring false or malicious complaints will result in strict disciplinary action, ranging from written warnings to termination.

Procedure for Complaints

1. **Raising Concerns:** Affected employees can report concerns verbally or via email to the CEO/Partner.
2. **Initial Discussion:** The CEO/Partner will meet with the complainant to understand the issue.
3. **ICC Formation:** A three-member ICC will be constituted to investigate, with clear timelines set.
4. **Investigation:** The ICC will conduct a thorough inquiry and submit a report to the firm's Partners.
5. **Action:** The Partners will determine disciplinary measures, involving external agencies if necessary.
6. **Closure:** Investigation concludes upon mutual consent between the Partners and the complainant.