

**TOYOTA FINANCIAL SERVICES INDIA
LIMITED**

**PREVENTION OF SEXUAL HARASSMENT
AT WORKPLACE POLICY**

Version 4.0

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I. Introduction:

- 1) Toyota Financial Services India Limited (TFSIN) strives for competitive excellence and is committed to lawful and ethical conduct and adhering to the company's values which include, integrity, honesty, and respect for people.
- 2) TFSIN is committed to providing a safe and conducive work environment to its employees and expects them to combine 'expertise with responsibility.' Towards this, it is essential that each employee deals with their colleagues and third parties with full respect and realizes that their behavior will be attributed to the company and can affect its reputation.
- 3) Harassment of any kind, including sexual harassment, is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers their own behavior to be normal or acceptable and whether the harassed person has the opportunity to avoid harassment. TFSIN is committed to providing a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of men and women at work.
- 4) TFSIN's goal is to ensure a safe, secure, and congenial work environment where employees, associates, and partners will deliver their responsibilities without any inhibition, threat, or fear. Accordingly, TFSIN has adopted this policy for prevention of workplace harassment including sexual harassment (this policy), the goals of which are (A) spreading awareness about the cause and consequences of harassment, (B) prohibiting, preventing, and deterring the commission of acts of harassment at the workplace. This policy provides the procedure for the redressal of complaints pertaining to harassment.

II. Objective:

- 1) To fulfil the directive of the Indian Law including POSH Act (Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013), enjoining all employers to develop and implement policy to prohibit sexual harassment of women at the workplace.
- 2) To uphold employees right to protection against sexual harassment and the right to livelihood, and towards that end, the prevention and redressal of any kind of harassment including sexual harassment.
- 3) To establish a mechanism for the prevention, prohibition, and redressal of complaints of harassment at TFSIN.
- 4) To actively promote a social, physical, and psychological environment that will raise awareness about and deter acts of harassment of employees, especially sexual harassment.

- 5) To undertake all necessary and reasonable steps including the constitution of appropriate committees for the purpose of gender sensitization and to conduct inquiries into complaints of harassment.
- 6) To uphold the commitment of TFSIN to provide an environment free of discrimination and violence against women & men.

III. Scope & Applicability:

- 1) This Policy applies to all the employees (whether in the office premises or outside while on assignment) of TFSIN regardless of their position, including those on contract and sub-contract work with TFSIN and covers sexual harassment by TFSIN's employees of anyone connected with TFSIN's business such as vendors and visitors.
- 2) Where a TFSIN employee is subject to sexual harassment by a third party or outsider while such employee is on official duty, TFSIN will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.
- 3) This policy is gender neutral and covers harassment of women by men, of men by women or, between the same sexes. Harassment is unlawful irrespective of who is involved in the behavior.
- 4) This policy is not restricted to TFSIN's premises but extends to all locations wherever TFSIN's employees have occasion to interact on company matters including work from home situations or engage in networking including, the company provided transport, their premises, off site where company meetings are held; provided that this policy does not apply when employees decide to meet outside of TFSIN's office location of their own accord and for personal reasons.

IV. Definitions:

- 1) Employee: Shall mean all On-roll staff including Trainees, Probationers, Fixed Term Employees (FTEs), Inter Company Transfer (ICT – IN & OUT), Off-roll, Retainers, Apprentices and Interns.
- 2) Management: Shall mean the (A) Managing Director & Chief Executive Officer, (B) Whole Time Director & Deputy Chief Executive Officer of Toyota Financial Services India Limited.
- 3) Workplace: Means this policy is not restricted to TFSIN's premises but extends to all locations wherever TFSIN's employees have occasion to interact on company matters or engage in the networking including, the company provided transport, their premises, off-site where company meetings are held; provided that this policy does not apply when employees decide to meet outside of TFSIN's office location of their own accord and for personal reasons.

- 4) Internal Complaints Committee (ICC): Shall mean the committee formed under this policy and as required under the Sexual Harassment of Women at the Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Internal Complaints Committee (ICC) is also called as Internal Committee (IC).
- 5) Complainant: An employee who alleges to have been subjected to any act of sexual harassment
- 6) Respondent: Person against whom the aggrieved employee has made a complaint.
- 7) Sexual Harassment: Shall mean and include any of the following:
 - A. Any unwelcome sexually determined behavior such as sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature, is explicitly or implicitly made or implied, with or without being accompanied by any promise/threat related to the terms or conditions of employment, participation, or evaluation of an employee's engagement in TFSIN's activity or continued employment at TFSIN.
 - B. Any unwelcome sexually determined behavior, including but not limited to sexual advances, physical and/or verbal or non-verbal or contact, such as loaded comments, remarks or jokes, letters, phone calls, SMS or emails, gestures, exhibition of pornography, lurid stares, physical contact, stalking, sounds or display of a derogatory nature while having purpose and/or effect of interfering with an employee's work or creates an intimidating, hostile or offensive employment or living environment.
 - C. When an employee uses with sexual purpose, the body or any part of it or any object as an extension of the body in relation to another employee without their consent or against their consent or against their will, or when both or either of the perpetrator or victim is under influence of alcohol or any psychotropic drug or otherwise intoxicated due to any such substance, such conduct will amount to sexual assault.
 - D. Any behavior that falls in the list below or has the same impact as any of the listed items, on an employee:
 - a) Any taunting snide remarks based on sex (including pregnancy, childbirth, or related medical condition), sexual orientation, gender identity, marital status, or personal appearance.
 - b) Phone calls or electronic messages that are abusive or offensive to the receiving employee and are remarks based on sex.
 - c) Intrusive questions about sexual activity, tales exploits, comments about people's bodies, or asking irrelevant personal questions of sexual nature to an employee.

- d) Repetitive unwanted advances (requests for dates or social contact) toward someone, or displaying of books, photography, paintings, films, pamphlets, packages, etc. containing indecent representation of women/men.
 - e) Viewing or sharing through letters, phone calls, electronic instant messaging or email messages any pornographic posters, internet sites, cartoons, or drawings of a sexual nature.
 - f) Telling lewd jokes, offensive language, singing or humming vulgar songs, etc.
 - g) Offensive gestures, staring, leering, or whistling with the intention to insult or discomfort someone or another who may hear or see such behavior.
 - h) Intentional touching of the body, that makes a person uncomfortable.
 - i) Inappropriate behavior/touching at the workplace even if the recipient welcomes it.
 - j) Indecent exposure.
- E. Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories (a) quid pro quo, (b) creation of a hostile working environment.
- a) Quid pro quo: Under the quid pro quo (meaning this for that) form of harassment, a person or authority, usually the superior of the victim, makes implied or explicit demands for sexual favors in return of preferential treatment during their employment with TFSIN, such as for getting or keeping a job benefit or any implied or explicit threat of getting or keeping a job or any implied or explicit threat of detrimental treatment during their employment with TFSIN or about the present or future employment status such as threatening to give a low performance rating or to fire the employee if the conditions are not met.
 - b) Hostile work environment: A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates a workplace atmosphere that is intimidating, hostile, offensive, or humiliating and perceived as an attack on personal dignity.
- 2) Bullying: Bullying is any intimidating or insulting behavior that makes any employee feel vulnerable, humiliated, and/or threatened. It includes the following behavior or any similar behavior that has the same impact:
- A. Shouting at, being sarcastic towards, ridiculing, or demeaning others.
 - B. Physical or psychological threats.

- C. Inappropriate and/or derogatory remarks about someone's performance.
- D. Abuse of power by those in positions of seniority and authority; or
- E. Exclusion from communication and meetings with the intent to disadvantage a person.
- F. The above behaviour among other circumstances, if it occurs, or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment.

Note: A legitimate and constructive criticism of an employee's performance, behavior, or reasonable requests made of employees in the course of their employment will not constitute bullying.

II. Policy:

1) Employee Rights and Responsibilities:

- A. An employee who believes they have been subjected to any kind of workplace harassment has the following avenues of redressal and the employee can make use of the avenues either alone or together. An employee who is sexually harassed can complain about the same even if there is no adverse job consequence.
- B. Direct communication: Any employee who believes they have been the target of harassment is encouraged to inform the offending person orally or in writing that such conduct is unwelcome, offensive and must stop. If the employee does not wish to communicate directly with the offending person, or if such communication has been ineffective, the employee has multiple avenues for reporting allegations of sexual harassment and/or pursuing resolution.
- C. Reporting to Supervisor/Senior Management: Subject to the reporting procedures set forth in section V.4 (Reporting Process), employees are encouraged to report the unwelcome conduct as soon as possible to a responsible department or company official, it is usually most effective, although it is not required that the official be within the employee's supervisors, the offending person's supervisor and/or management officers of the company. Such supervisors will thereafter guide the aggrieved person to take the matter to Internal Committee in the prescribed manner.
- D. Reporting to Internal Committee: An employee who has been subject of sexual harassment, can report the harassment to the Internal Committee (IC) as per the reporting procedure in section V.4 (Reporting Process).

2) Co-Employee Responsibility:

- A. If you become aware of any incident of harassment or if any employee confides in you about any incident of harassment that has happened with an employee, you should follow these guidelines:
- a) Do not judge on your own the truth of the incident. Encourage the people involved to follow the process under this policy.
 - b) Do not disbelieve an employee when they share their concerns about sexual harassment. Remember sexual harassment is 'unwelcome behavior'. Do not trivialize the matter. Remember that it is difficult to speak about sexual harassment. Hence if a colleague is talking about it, they will require a lot of encouragement and support. Please encourage the colleague to report the matter to either a supervisor or any member of the Internal committee as soon as possible.
 - c) Protecting all the people involved, i.e., the alleged victim and the perpetrator, is the responsibility of all employees. Do not share this information or talk to any internal or external person about any incident of harassment that you are aware of. This may have a long-term traumatic effect on the people involved.

3) Reporting channel:

An Internal Committee (IC) has been formed to receive and resolve all complaints related to sexual harassment; the details of the team have been provided as Annexure. This Committee shall undergo changes as and when required with the approval of the MD & CEO.

4) Reporting process:

- A. Any employee who is the recipient of behavior can reasonably be construed as constituting harassment and is expected to report the same at the earliest. A complaint relating to harassment shall ordinarily be lodged within 3 months from the date of the alleged offence and in the case of a series of incidents, within 3 months of the last incident. Any delay in reporting beyond 3 months must be explained to the IC with sufficient cause, IC may exercise its discretion to accept the complaint within 3 months (maximum) if the reasons for the delay as explained are genuine or beyond the control of the complainant.
- B. If an employee knows of or suspects the occurrence of such harassment to anyone else, they should encourage the recipient employee to report the same and could offer to speak for/accompany the person if the individual needs support.

- C. Complaints under this policy may be lodged with the IC at the mail id given in Annexure. Complaints must be made in writing to enable a formal investigation and inquiry into the matter. Appropriate measures will be taken by the authorities to ensure confidentiality to the extent possible, and each party gets a fair hearing.
- D. The employee concerned may mail in writing at the designated mail id to the IC giving details of their complaint to the IC, giving details of the incident, along with the supporting documents, evidence, and name(s) of witnesses, if any, within three months of its occurrence. If required, during preliminary investigation, the IC may ask for six signed copies of their complaint in writing giving the required details, evidence, and the name of the witness, if any.
- E. If the aggrieved person is unable to make a complaint on account of their physical or mental incapacity or death, their legal heirs or such other person as may be prescribed by the POSH Act (Sexual Harassment of Women at the Workplace (Prevention, Prohibition, and Redressal) Act, 2013) and POSH Act Rules, may do so.
- F. Anonymous complaints cannot be entertained as per law.
- G. SHE-Box: TFSIN is registered as a Private employer on the SHE-Box portal of Ministry of Women and Child development. This portal is an additional channel through which the Complainant can upload the complaint if felt necessary. The complaint will thereafter be forwarded to TFSIN by the SHE-Box Nodal officer and will be taken up by the Internal Committee.
- H. SHE-Box is an additional channel and not mandatory. We encourage employees to directly write to Internal Complaints Committee and assure that IC will address the issue immediately as per processes set through this policy.

5) Investigation Process:

- A. Any complaint received by the IC shall be kept confidential by the members of IC to the extent possible.
- B. The IC shall ensure that a fair and just investigation is undertaken immediately in accordance with principles of natural justice. The investigation process shall be initiated within 7 working days of receiving the complaint and shall be completed within 90 days of receipt of the complaint.
- C. The management shall not in any way interfere with the IC during the course of an investigation. It shall provide all the support possible to arrive at the best and fair solution in the interest of all employees involved in the issue. Within seven working days of the receipt of the complaint, the IC shall inform the person accused that a complaint has been filed against them and send one copy of the complaint along with supporting documents to the accused. The IC shall inform the accused that no unfair acts of victimization, retaliation or unethical action or coercion against the aggrieved employee will be tolerated during and after the investigation proceedings and if required TFSIN shall take adequate steps to prevent such retaliation, etc., or if such protection is requested by the aggrieved employee.

- D. The accused shall be required to represent their case in writing along with supporting documents and details of witnesses within 10 working days of receipt of the notice.
- E. Initially both the complainant and the alleged accused will be heard separately with a view to ascertain the veracity of their contentions. If required, the person(s) named as witness will also be heard by IC to seek any information necessary to assist in resolving the matter satisfactorily.
- F. Subject to the aggrieved employee's consent and based on written representations of both parties and the above hearings, the IC will initially try to settle the matter amicably between the parties through conciliation. The conciliation will be undertaken by the IC. No monetary settlement will be made as a basis of conciliation.
- G. In case the aggrieved employee is willing to enter conciliation or after efforts of conciliation, no settlement has been reached, the IC shall initiate inquiry into the matter.
- H. Based on the representations of both parties, witness accounts and evidence submitted, the IC may launch an independent inquiry into the matter. Both the parties shall be given a copy of the interim findings of the IC to enable them to make a final representation against the finding before the IC, where both the parties are employees of the company.
- I. Neither party shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before IC. However, at its discretion and after giving a 15-days' notice, the IC may terminate the proceedings or give a sentence in absence of the absconding party if the complainant or accused fail to appear before the IC for 3 consecutive hearings without sufficient cause.
- J. On completion of the inquiry, the complainant and the accused shall be informed of the outcome of the investigation in writing. If the investigation reveals that the complainant has been sexually or otherwise harassed as claimed, the accused will be disciplined accordingly.
- K. The Complainant can request the Internal committee for interim relief during the Inquiry process. This includes leave or transfer. If the Complaint is against a reporting Supervisor, the Complainant can request for a change in performance appraising authority/person. These will be considered at the sole discretion of the Internal Committee if a need for such relief is established/ found justified.

6) **Disciplinary Action:**

- A. Where any misconduct is found by the IC, appropriate disciplinary action shall be taken against the accused. Disciplinary action may range from/include oral/written warnings, transfer, a change of role, withholding promotion, suspension or even termination of employment.

- B. IC can also determine the compensation including monetary damages, if any (please note, employee cannot opt conciliation in lieu of money) on the basis of loss of career opportunity, hospitalization cost, mental trauma, pain, agony, financial status of respondent and pay capability etc.

7) Confidentiality:

- A. It shall be the duty of everyone (including the members of the IC, the complainant, the accused, the witnesses, the other participants and all the employees of TFSIN), whether they are involved in the process, to ensure that all incidents/grievances/complaints lodged under this policy including identity of the complainant and accused are kept as confidential as much as possible.
- B. Any person (including witnesses) who breaches confidentiality or publishes or makes known to the public, press and media, any information related to the above, shall be subject to disciplinary action.

- 8) Any aggrieved employee who feels that a harassment complaint or a retaliation complaint did not receive prompt response from IC may bring it to the notice of CHRO / MD & CEO within 15 days of giving such a complaint to IC.

9) Protect against retaliation:

- A. Regardless of the outcome of a 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.
- B. While dealing with complaints of harassment, the IC 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 IC as soon as possible. Disciplinary action will be taken by the IC if any such complaints are found to be genuine.
- C. Retaliation will be treated as seriously as a case of harassment and will apply even if the original complaint of harassment is not proven. Retaliation will be treated as a gross misconduct and Toyota Financial Services India Limited will take appropriate action to address any instance of retaliation.

10) Documenting Harassment:

- A. Documenting harassment is important for use as evidence in a case or complaint. You are encouraged to (a) photograph or keep copies of any offensive material at the workplace; (b) keep a journal with detailed information of the instances of harassment; (c) note the dates, conversation, frequency of offensive encounters etc.; and (d) obtain copies of your work records (including performance evaluations) and keep these copies.

- B. The IC shall keep complete and accurate documentation of the complaint, its investigation, and the resolution thereof. The incident would be mentioned in both the complainant's and the accused's files with the full report of the IC.
- C. The IC will send an annual report regarding matters reported to it under this policy, as well as any such complaint outcome, to the management of TFSIN.

11) Dissemination of the policy:

A copy of this policy shall be made available to all employees, including any new employees, and each employee shall acknowledge physically or electronically that they have received and read, understood, and will comply with this policy.

12) Appeal - Judicial Remedy:

The Internal Complaints Committee will share copies of their Final recommendations with both Complainant and the Respondent (Accused) apart from sending such recommendations to Management for taking action. If not satisfied by the recommendations of the Internal Committee, both the Complainant and the Respondent (accused) can appeal against such final recommendations. They can also appeal against non-implementation of the final recommendations of the Internal committee by the employer (Management) if that happens.

Please note the following two important aspects about filing an Appeal:

- a. Appeals have to be filed within 90 days of the date of final recommendations of IC.
- b. Appeals have to be filed before Appellate authorities which are courts or tribunals as notified under POSH Act-2013 by the respective (appropriate) State or Central government.

13) Complaints made with malicious intent:

- A. This policy has been developed as a tool to ensure that in the interest of justice and fair play, TFSIN employees have a forum and procedures to report instances of workplace harassment. However, if it is revealed that the complaint was made with a malicious intent or knowing it to be false and with the motive of maligning the concerned individual/tarnishing their image in the company and to settle personal/professional score or where any party has produced false or misleading documents as evidence, disciplinary action shall be taken against the person.
- B. This will also apply to an employee who appears as a witness with malicious intent or gives false testimony. However, a mere inability to substantiate a complaint or provide adequate proof will not attract disciplinary action under this section. This disciplinary action could include termination of employment.

14) General:

- A. TFSIN reserves the right to modify and amend the provisions of this policy, to comply with applicable legal requirements, internal policies, or with a view to altering the provisions of this policy to the extent deemed necessary, appropriate, or desirable by TFSIN from time to time. Any amendment to this policy shall be effective only with the approval of the MD & CEO.
- B. Since Sexual Harassment is a subject matter of Indian law and more particularly the POSH Act (Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013), the law will prevail over the provisions of the policy, where necessary.

15) Record Keeping:

- A. The IC will maintain the complaints register as a written record, setting out full details of the complaints received, and actions taken.
- B. The HR & Admin team shall update the Compliance Officer from time to time on every entry made in that register and information on complaints received and actions taken.
- C. Record Retention: All records relating to below-mentioned governing legislation/compliance matters shall be maintained for a minimum of 8 years, and diligent efforts should be used to maintain original documents.
- D. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts will be kept 'off-book' to facilitate or conceal improper payments and the same is ensured through effective monitoring and auditing mechanisms in place.

Note: *Ignorance of any aspect of this policy cannot be used as defence during an inquiry on the matter.*

Annexure I**INTERNAL COMMITTEE**

The Internal Committee (IC) consists of the following employees for a tenure of 3 years starting from Feb 4, 2026, to Feb 4, 2029.

| # | Name | Designation | Role | Responsibility | Phone No. | E-Mail ID |
|---|--------------------------|-----------------|--------------------|--|------------|--|
| 1 | Prarthana Gupta | Chairperson | Presiding Officer | <ul style="list-style-type: none"> - Handle sensitive issues such as "Sexual Harassment." - Oversee the proceedings and ensure that they are in accordance with the provisions of the Act. - Guide the Nodal Officer/Records Officer in their actions and delegate responsibilities to others as and when necessary. - Annual Return Filing by 31 Jan. | 9560688994 | prarthana.gupta@tfsin.co.in |
| 2 | Amitha Raj | Internal Member | Nodal Officer | <ul style="list-style-type: none"> - Receive/process the complaint. - Facilitate the committee meeting. - Awareness & orientation sessions. - Co-ordinate with all concerned including the HR department in a timely manner. | 9902332042 | amitha.raj@tfsin.co.in |
| 3 | Neelima Sunil Khandelwal | Internal Member | Records Officer | <ul style="list-style-type: none"> - Create and maintain records. | 7019250401 | Neelima.Khandelwal@tfsin.co.in |
| 4 | P Satyadeep | Internal Member | Committee Member | <ul style="list-style-type: none"> - Participates in meetings/Inquiry. | 9663288199 | p.satyadeep@tfsin.co.in |
| 5 | Santosh Rao | Internal Member | Committee Member | <ul style="list-style-type: none"> - Participates in meetings/Inquiry. | 9741955322 | santosh.rao@tfsin.co.in |
| 6 | Sudha Jayaram | External Member | Primary Consultant | <ul style="list-style-type: none"> - Bring an unbiased & informed opinion to the table. - Guide the Presiding Officer where requested. - Peruse all reports prepared by Nodal Officer/Records Officer before finalization. | 9449850684 | sudha@resonanceconsulting.in |
| 7 | Sabita Prasad | External Member | Support Consultant | <ul style="list-style-type: none"> - Handle employee calls and e-mails if any employee reaches out. - Review of Annual returns before submission. - Support to establish a governance model around the policy. - Conducting Orientation/Awareness Sessions. | 9845121157 | sabita@resonanceconsulting.in |

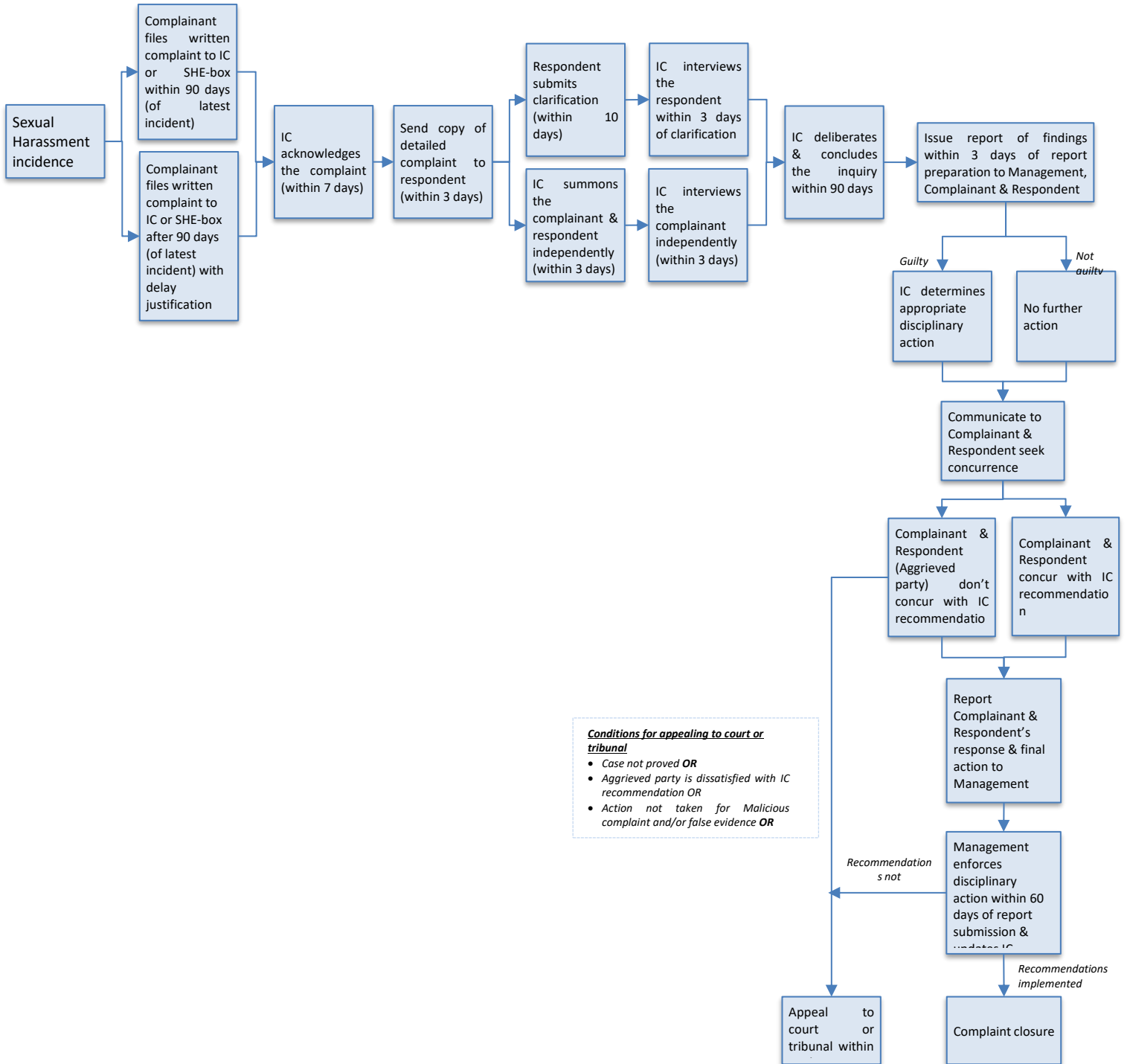
Mail ID of the Internal Complaints Committee (IC): posh@tfsin.co.in

The constitution of this committee is subject to change, with approval from the **MD & CEO**.

P B Venugopal
MD & CEO

Annexure II

POSH COMPLAINTS REDRESSAL PROCESS FLOW



Conditions for appealing to court or tribunal

- Case not proved OR
- Aggrieved party is dissatisfied with IC recommendation OR
- Action not taken for Malicious complaint and/or false evidence OR

Note:
As per POSH act there are no timelines for each step. The timelines mentioned in the process are as recommended by our external consultant for on time closure of POSH complaints
Aggrieved party – Complainant or Respondent dissatisfied with IC recommendation