

## CORPORATE POLICY ON PROHIBITION OF SEXUAL HARASSMENT

### 1. PREAMBLE

Sexual harassment at the workplace results in violation of the fundamental rights of a woman

- to equality under Articles 14 and 15 of the Constitution of India
- to life and to live with dignity under article 21 of the Constitution
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

Toyota Material Handling India Private Limited (hereinafter referred to as the "Company") is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" of India (hereinafter referred to as the "Act") and existing rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "Rules").

### 2. APPLICABILITY

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

This version of the policy is effective from 17<sup>th</sup> February, 2023 and supersedes all prior policies and communication on this matter.

### 3. DEFINITIONS

**Sexual Harassment:** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:

1. Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
  - a. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
  - b. Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
  - c. Demand or request for sexual favors
  - d. Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body
  - e. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
  - f. Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
  - g. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes



- h. Giving gifts or leaving objects that are sexually suggestive
  - i. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
  - j. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
2. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
- a. Implied or explicit promise of preferential treatment in employment;
  - b. Implied or explicit threat of detrimental treatment in employment;
  - c. Implied or explicit threat about the present or future employment status;
  - d. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
  - e. Humiliating treatment likely to affect health or safety.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

**Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

**Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy.

**Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.

**Employee:** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

**Workplace:**

- a. Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company.
- b. Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.

**Employer:** A person responsible for management, supervision and control of the workplace

#### 4. ROLES AND RESPONSIBILITIES

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a. Refusing to participate in any activity which constitutes harassment
- b. Supporting the person to reject unwelcome behaviour
- c. Acting as a witness if the person being harassed decides to lodge a complaint

#### 5. REDRESSAL MECHANISM

In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy.





**A. INTERNAL COMPLAINTS COMMITTEES ((Henceforth known as 'ICC')**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, the Company has established Internal Complaints Committees (ICC) at its various locations for dealing the issues of sexual harassment. The details of the members of these committees are as given in Annexure-A annexed herewith and is notified to all covered persons at all the locations (workplace).

**The committee at each location comprises of:**

1. Presiding Officer: A woman employed at a senior level in the organization or workplace.
2. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge
3. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
4. At least one half of the total members nominated being women

Every Member of ICC shall hold office for such period, not exceeding three (3) years, from the date of their nomination. The member appointed shall be paid such fees or allowances for holding the proceedings of ICC, as may be prescribed by the Employer.

**The committee will be responsible for:**

- a) Receiving complaints of sexual harassment at the workplace
- b) Initiating and conducting inquiry as per the established procedure
- c) Submitting findings and recommendations of inquiries
- d) Coordinating with the employer in implementing appropriate action
- e) Maintaining strict confidentiality throughout the process as per established guidelines
- f) Submitting annual reports in the prescribed format

**B. LODGING A COMPLAINT**

An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of 3 months from the date of incident/ last incident. The Internal Complaints Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

1. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:
  - a. her relative or friend; or
  - b. her co-worker; or
  - c. an officer of the National Commission for Women or State Women's Commission; or
  - d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman
2. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:



- a. her relative or friend; or
  - b. a special educator; or
  - c. a qualified psychiatrist or psychologist; or
  - d. the guardian or authority under whose care she is receiving treatment or care; or
  - e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
3. If the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
4. If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

The complaint shall be submitted by the complainant to the IC in writing. The complaint can also be physically submitted to any ICC member.

**C. CONCILIATION**

Before the IC initiates an inquiry, the complainant may request the IC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC.

**D. COMPLAINTS HANDLING PROCEDURES**

The Company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

- a) On receipt of a complaint of sexual harassment at workplace, the committee will immediately arrange to fully enquire and investigate all relevant details of the matter as per the procedure laid down in the Act. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the aggrieved woman. The person, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the committee.
- b) The result of this investigation will be formally recorded and communicated to the MD of the Company, along with a recommendation for appropriate action.
- c) The committee will normally complete this process and make its recommendation within 90 days after receiving the complaint unless there are exceptional circumstances.
- d) Necessary action will then be taken with regard to the aggrieved woman based on the circumstances and seriousness of the offence.
- e) The Company shall keep/maintain a record of the entire investigation procedure.
- f) The copies of settlement/decision recorded shall be provided to the aggrieved woman and the respondent.
- g) In case, the ICC arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint





knowing it to be false or the aggrieved woman has produced any forged or misleading document, it may recommend to the employer to take action against the woman involved in such malicious complaint.

The ICC shall function in accordance with the provisions of the existing law in this regard.

#### 6. PENAL CONSEQUENCES OF SEXUAL HARASSMENT

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment, has made this a 'cognizable offence' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

#### 7. MALICIOUS ALLEGATIONS

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

#### 8. CONFIDENTIALITY

The identity of the complainant, respondent, witnesses, statements and other evidences obtained in the course of inquiry process, recommendations of the committee, action taken by the employer and such other information is considered as confidential materials, and the same is not supposed to be published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the Act.

#### 9. APPEAL

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

Reference no. REV/POSH/September 2025



*[Handwritten Signature]*

Hajime Iwase  
Managing Director

Dated: 24.09.2025

### Annexure-A

Internal Complaint Committee of Head Office, Gurgaon & Branch Office, Delhi					
S. No.	Name of Members	Position	Date of Appointment	Contact details	E-mail ID
1.	Ms. Sakshi Nirmal Manager-Legal & Secretarial	Presiding Officer	17-12-2024	+91 95828 41259	<a href="mailto:nirmal.s@tmhin.toyota-industries.com">nirmal.s@tmhin.toyota-industries.com</a>
2	Mr. Hariprasad S. Chief Operating Officer	Member	24-09-2025	+91 98447 20713	<a href="mailto:hariprasad.s@tmhin.toyota-industries.com">hariprasad.s@tmhin.toyota-industries.com</a>
3.	Ms. Yashika Dhall Assistant Manager-Legal & Secretarial	Member	17-12-2024	+91 95827 06662	<a href="mailto:dhall.y@tmhin.toyota-industries.com">dhall.y@tmhin.toyota-industries.com</a>
4.	Ms. Preeti Pahwa Practicing Company Secretary	External Member	24-09-2025	+91 98990 20006	<a href="mailto:preeti@emindslegal.com">preeti@emindslegal.com</a>

Internal Complaint Committee of Branch Office, Pune					
S. No.	Name of Members	Position	Date of Appointment	Contact details	Email ID
1.	Ms. Sakshi Nirmal Manager-Legal & Secretarial	Presiding Officer	24-09-2025	+91 95828 41259	<a href="mailto:nirmal.s@tmhin.toyota-industries.com">nirmal.s@tmhin.toyota-industries.com</a>
2.	Mr. KP Vinodkumar Chief Regional Officer	Member	24-09-2025	+91 86000 11280	<a href="mailto:kumar.v@tmhin.toyota-industries.com">kumar.v@tmhin.toyota-industries.com</a>
3.	Ms. Shallu Batra Deputy Manager - HR & Admin	Member	24-09-2025	+91 85120 60032	<a href="mailto:Batra.s@tmhin.toyota-industries.com">Batra.s@tmhin.toyota-industries.com</a>
4.	Ms. Preeti Pahwa Practicing Company Secretary	External Member	24-09-2025	+91 98990 20006	<a href="mailto:preeti@emindslegal.com">preeti@emindslegal.com</a>





## TOYOTA MATERIAL HANDLING INDIA

Internal Complaint Committee of Branch Office, Mumbai					
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1.	Ms. Sakshi Nirmal Manager-Legal & Secretarial	Presiding Officer	24-09-2025	+91 95828 41259	<a href="mailto:nirmal.s@tmhin.toyota-industries.com">nirmal.s@tmhin.toyota-industries.com</a>
2.	Mr. Abhishek Tiwari Branch Manager- Mumbai	Member	24-09-2025	+91 90044 15045	<a href="mailto:tiwari.a@tmhin.toyota-industries.com">tiwari.a@tmhin.toyota-industries.com</a>
3.	Ms. Shallu Batra Deputy Manager - HR & Admin	Member	24-09-2025	+91 85120 60032	<a href="mailto:Batra.s@tmhin.toyota-industries.com">Batra.s@tmhin.toyota-industries.com</a>
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Internal Complaint Committee of Branch Office, Ahmedabad					
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1.	Ms. Sakshi Nirmal Manager-Legal & Secretarial	Presiding Officer	24-09-2025	+91 95828 41259	<a href="mailto:nirmal.s@tmhin.toyota-industries.com">nirmal.s@tmhin.toyota-industries.com</a>
2.	Mr. Saurabh Prakash Branch Manager- Ahmedabad	Member	24-09-2025	+91 86002 39978	<a href="mailto:prakash.s@tmhin.toyota-industries.com">prakash.s@tmhin.toyota-industries.com</a>
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Internal Complaint Committee of Branch Office, Bangalore					
S. No.	Name of Members	Position	Date of Appointment	Contact details	Email ID
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2.	Ms. Yashika Dhall Assistant Manager -Legal & Secretarial	Member	24-09-2025	+91 95827 06662	<a href="mailto:dhall.y@tmhin.toyota-industries.com">dhall.y@tmhin.toyota-industries.com</a>
3.	Mr. Hariprasad S. Chief Operating Officer	Member	24-09-2025	+91 98447 20713	<a href="mailto:hariprasad.s@tmhin.toyota-industries.com">hariprasad.s@tmhin.toyota-industries.com</a>
4.	Ms. Shallu Batra Deputy Manager - HR & Admin	Member	24-09-2025	+91 85120 60032	<a href="mailto:Batra.s@tmhin.toyota-industries.com">Batra.s@tmhin.toyota-industries.com</a>
5.	Ms. Preeti Pahwa Practicing Company Secretary	External Member	24-09-2025	+91 98990 20006	<a href="mailto:preeti@emindslegal.com">preeti@emindslegal.com</a>

### Toyota Material Handling India Pvt. Ltd.

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Internal Committee of Branch Office, Chennai					
S. No.	Name of Members	Position	Date of Appointment / Re-appointment	Contact details	E-mail ID
1.	Ms. Sakshi Nirmal Manager-Legal & Secretarial	Presiding Officer	24-09-2025	+91 95828 41259	<a href="mailto:nirmal.s@tmhin.toyota-industries.com">nirmal.s@tmhin.toyota-industries.com</a>
2.	Mr. Rajendran D Regional Manager-South	Member	24-09-2025	+91 96557 04445	<a href="mailto:rajendran.d@tmhin.toyota-industries.com">rajendran.d@tmhin.toyota-industries.com</a>
3.	Ms. Shallu Batra Deputy Manager - HR & Admin	Member	24-09-2025	+91 85120 60032	<a href="mailto:Batra.s@tmhin.toyota-industries.com">Batra.s@tmhin.toyota-industries.com</a>
4.	Ms. Preeti Pahwa Practicing Company Secretary	External Member	24-09-2025	+91 98990 20006	<a href="mailto:preeti@emindslegal.com">preeti@emindslegal.com</a>

Internal Committee of Branch Office, Hyderabad					
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2.	Mr. Hariprasad S. Chief Operating Officer	Member	17-12-2024	+91 98447 20713	<a href="mailto:hariprasad.s@tmhin.toyota-industries.com">hariprasad.s@tmhin.toyota-industries.com</a>
3.	Ms. Shallu Batra Deputy Manager - HR & Admin	Member	17-02-2023	+91 85120 60032	<a href="mailto:Batra.s@tmhin.toyota-industries.com">Batra.s@tmhin.toyota-industries.com</a>
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 Website : [www.toyotamaterialhandlingindia.com](http://www.toyotamaterialhandlingindia.com)



Internal Complaint Committee of Branch Office, Coimbatore					
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Internal Complaint Committee of Branch Office, Chandigarh					
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