

## TIMKEN SEXUAL HARASSMENT POLICY

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Every Associate is expected to comply with the company's policy against Sexual Harassment, set forth in the associate handbook.

**This policy is applicable to all Associates of the Company, male or female.**

It is the policy of the company to provide a work environment free from all harassment. Harassment of any kind including gender, race, nationality or religion will not be tolerated.

**Sexual Harassment** means and includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):

- (i) physical contact or advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other physical, non-physical, verbal or non-verbal conduct of sexual nature; or

Additionally, the below acts will also amount to Sexual Harassment:

- (i) implied or explicit promise of preferential treatment in employment; or
- (ii) implied or explicit threat of detrimental treatment in employment; or
- (iii) implied or explicit threat about the present or future employment status; or
- (iv) interference with the work or creating an intimidating or offensive or hostile work environment for the Employee; or
- (v) humiliating treatment likely to affect the health and safety of the Employee
- (vi) Or any other definition as per applicable law

Company will organize workshops and awareness programmes at regular intervals for the Employees, and orientation programmes for the Committee. Company will display at the workplace details of the penal consequences of indulging in acts of sexual harassment, the composition of the Committee including names and contact details of the members, and the grievance redressal mechanism available to Complainant. The Company will assist the Complainant in initiating action under Indian Penal Code or under any other law at the behest of the Complainant.

Sexual harassment does not refer to behaviour or occasional compliments of a socially acceptable nature. It refers to behavior that occurs on or off company premises that is not welcome, is personally offensive, fails to respect the rights of others, lowers morale and, therefore, interferes with work effectiveness.

Sexual Harassment of any Timken Company associate by a member of management, another associate or any other individual who comes in contact with our associates as part of his or her job is not tolerated. Company premises should be free of literature or other material of a sexual or otherwise offensive nature.

A hostile work environment can be created even if the "victim", he or she does not complain. A victim can be a third party victim.

**For Pay manager-** As pay manager you are expected to comply with this policy and members of management are expected to take appropriate measures to ensure that such conduct does not occur. Disciplinary action up to and including discharge is taken against anyone who violates this sexual harassment policy. As a manager, you have to educate the associates on the above policies and the compliant procedure in case of any violation of the above policies.

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