

POLICY ON PREVENTION OF SEXUAL HARRASMENT AT WORKPLACE OF MUTHOOT HOUSING FINANCE COMPANY LIMITED

1. PURPOSE:

Muthoot Housing Finance Company Limited (henceforth referred to as “MHFL”) is committed to providing an environment conducive to the growth and development of its all employees. Given this commitment, the Company strives to provide equal opportunities at employment devoid of gender-based discrimination / coercion, intimidation or exploitation. The Company is dedicated to ensure enactment, observance and adherence to guidelines and best practices that prevent and prosecute commission of acts of sexual harassment.

The policy is applicable for all acts of sexual harassment alleged to have taken place by individuals within or outside the company premises where the company conducts its business.

Any act of violation of this policy, by employees or third party interacting with the company, will lead to appropriate remedial measures under the circumstances, including mitigation against the potential for repetition and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he / she has the authority to do so. The objective of this policy is to provide the definition, framework or modus operandi for addressing all allegations of sexual harassment made by any employee.

2. APPLICABILITY:

To all employees on the rolls of the company and outsourced personnel working in the company premises.

3. DEFINITIONS AND EXAMPLE OF SEXUAL HARRASEMENT:

Sexual harassment includes, but will not be confined to the following:

Creation of a hostile work environment through unwelcome sexual advances such as:

- Physical contact or molestation
- Stalking
- Requests for sexual favours, verbal or physical conduct of a sexual nature, either explicitly or implicitly, in return for a team or condition of instruction, employment, participation or evaluation of a person’s engagement in any Company activity.
- Sexually coloured remarks or jokes, letters, phone calls or e-mails, gestures, showing of pornography or other visual displays of degrading sexual images, lurid stares
- Sounds of a derogatory nature

- Sexual harassment by one in position of power or influence constituting quid pro quo when submission by an individual is made either in explicit or implicit terms or condition of employment or submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee such as promotion and pay rise.

Please note:

- The definition of sexual harassment will also apply to any member of a third party or outsider in relation to an employee of the Company or vice versa on the premises of Company.
- Any of the acts mentioned above, committed in circumstances wherein the victim of such conduct has a reasonable apprehension that in relation to the victim's employment or work, such conduct can be humiliating or may constitute to a health and safety problem, the same will tantamount to sexual harassment.

4. OBLIGATIONS OF THE COMPANY:

The Company shall be responsible, among others, for the following:

- Prohibit, prevent and deter commission of acts of sexual harassment.
- Implement the Policy in strict alignment, thus creating a favourable environment.
- Spread the awareness of the Policy amongst its employees by providing easy access to the policy through publication, notification and circulation of the same
- Sensitizing employees about sexual harassment issues
- Provide fair and impartial procedures for resolution, settlement or prosecution of acts of sexual harassment by taking all necessary steps
- Implementation of recommendations of the Complaints Committee (as defined hereinafter). It will be the responsibility of the Human Resource function to get an understanding of the issues raised and counsel the Complainant as well as the accused and make them aware of all implications of filing/ not filing a complaint formally.

In a scenario, wherein the Company / Complaint's committee becomes aware of commission of an act(s) of sexual harassment, the Company shall have the right to initiate suo moto action, even in the absence of a formal complaint being submitted by any employee.

5. COMPLAINTS COMMITTEE:

A Complaints Committee will be/has been set up by the Company, which will address all cases/complaints of alleged sexual harassment submitted by the employee(s) or initiate suo moto by the Company, to prevent a deal with sexual harassment within the outlined framework.

5.1 Composition

The Complaints Committee consists of the following:

- Chairperson
- Member
- Member
- One member from a third party such as NGO / outside counsel or a person or body conversant with dealing with the issue of sexual harassment

It is mandatory that at-least half the members of the Complaints Committee are women and the Complaints Committee is led by a women member.

5.2 Disqualifications

A person shall be disqualified for being appointed, elected, nominated or designated, or for continuing, as a member of the Complaints Committee, if there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.

6. CONFIDENTIALITY

It is the obligation of the Complaints Committee that all complaints of sexual harassment are treated and processed with utmost confidentiality, in alignment with the process outlined for required investigation and implementing corrective actions.

7. SUBMISSION OF A COMPLAINT

Any employee will have a right to lodge a complaint concerning sexual harassment against an employee or a third party interacting with the Company (henceforth referred to as "Complaint") with the Complaints Committee either in person or through an email as outlined below:

- An employee making a Complaint (henceforth referred to as "Complainant") will be provided full confidentiality.
- No person against whom a Complaint is made shall be part of the Complaints Committee.
- Within three (3) working days of the receipt of the Complaint, the Complaints Committee will convene a meeting of which advance written intimation will be given to the Complainant.
- The Complainant will be entitled to remain present personally during the meeting

During the first meeting of the Complaints Committee, the Complainant shall be heard and the Complaints Committee shall decide whether the Complaint requires to be proceeded with.

The Complaint will be dropped only if the Complainant does not disclose an offence of sexual harassment.

In case the Complaints Committee decides to proceed with the Complaint, the Complainant's concerns with respect to the issue shall be taken into account and if the Complainant so wishes the accused (henceforth referred to as "Accused") will be called to a meeting of the Complaints Committee, be heard and if necessary, warned about his / her behaviour and the matter concluded with a recording to that effect made by the Complaints Committee.

However, if the Complainant wishes to proceed with the Complaint beyond a mere warning to the Accused, the same will be proceeded with in the manner prescribed in this policy under the 'proceedings' section.

8. PROCEEDINGS OF THE COMPLAINTS COMMITTEE

The following is the redressal process, which will be adopted by the Complaints Committee to address any complaints lodged by an employee:

- The Complaints Committee will prepare the statement of allegation and will share the same with the Accused
- If the Accused desires to tender any written explanation to the statement of allegation, he/she shall submit the same to the Complaints Committee
- The Complaints Committee will give ample opportunity to the Complainant and the accused, for putting forward and defending their respective case by presenting witnesses and evidence, which may establish their claims
- The Complainant and the Accused will have the right to submit supporting evidence
- The Complaints Committee will complete the enquiry / investigation and prepare a report of its findings on the charges against the Accused and its decision to the Managing Director and any other such persons as nominated by him (henceforth referred to as the "Management") within a period of sixty (60) days from the date of filing of the Complaint by the Complainant.
- The report of the Complaints Committee will also include recommendations to the Management for imposition of penalty along with reasons for such recommendations, as applicable

9. IMPLEMENTATION OF RECOMMENDATIONS OF THE COMPLAINTS COMMITTEE :

The Management will consider the recommendations and findings of the Complaints Committee and will be required to arrive at a decision with respect to the proposed corrective action against the accused.

The Management has the right to issue such order and / or directions as it deems fit. The Management shall also endorse a copy of its order to the Complainant, Accused and to the Complaints Committee

10. PUNISHMENT FOR SEXUAL HARRASEMENT:

The Management can impose the following penalties, which are indicative and not exhaustive on an employee who is found guilty of sexual harassment. These can be further classified as minor and major penalties, as follows:

Minor penalties

- o Written warning

Major penalties

- o Withholding of performance based pay awards and bonus
- o Withholding of promotion
- o Termination of service

Further the employee will also be required to give a written apology to the Accused and upon his/her failure to do so, the penalty can be enhanced.

11. PROTECTION TO COMPLAINANT/VICTIM

MHFL 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.

12. MODIFICATIONS AND REVIEW OF THE POLICY

The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align / alter the provisions of the policy to the extent deemed necessary by Company from time to time.

12.1 Exceptions

There are no exceptions to this policy.

12.2 Contact

All queries and clarifications on the policy and procedures may be referred to the Human Resources team.