



MUTHOOT HOUSING FINANCE COMPANY LIMITED (MHFCL)

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POLICY ON PREVENTION OF SEXUAL HARASSMENT

Recommended by

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Approved by:

Board of Directors

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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.

Aggrieved Person (AP): Refers to any person "employee" who has lodged complaint of sexual harassment at workplace and need not be an employee of Company.

Respondent Person (RP): Refers to any 'employee' against whom the complaint has been lodged by aggrieved person.

Sexual Harassment - The definition of sexual harassment will be as defined in section 2 (n) of POSH Act.

Employer: A person responsible for management, supervision and control of the Workplace.

Roles & Responsibilities:

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

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

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 Internal 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. INTERNAL COMPLAINTS COMMITTEE:

An Internal Complaints Committee (ICC) 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 Internal 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 Internal Complaints Committee are women and the Internal Complaints Committee is led by a women member.

The tenure of the ICC members shall not exceed three years from the date of nomination.

5.2 Disqualifications

A person shall be disqualified for being appointed, elected, nominated or designated, or for continuing, as a member of the Internal 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 Internal 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 Internal Complaints Committee either in person or through an email as outlined below:

- All complaints can be made on posh.mhfl@muthoot.com.
- 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 Internal Complaints Committee.
- Within three (3) working days of the receipt of the Complaint, the Internal Complaints Committee will convene a meeting of which advance written intimation will be given to the Complainant.
- The Internal Complainant will be entitled to remain present personally during the meeting

During the first meeting of the Internal Complaints Committee, the Complainant shall be heard and the Internal 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 Internal 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 Internal 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 Internal 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 INTERNAL COMPLAINTS COMMITTEE

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

- The Internal 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 Internal Complaints Committee
- The Internal 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 Internal 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 Internal Complaints Committee will also include recommendations to the Management for imposition of penalty along with reasons for such recommendations, as applicable
- A timeframe of proceeding mentioned in **Annexure -A**.

9. INTERIM RELIEF

During pendency of the inquiry, on a written request made by the Aggrieved Individual, the Committee may recommend to the Employer to –

- Transfer the Aggrieved Individual or the Respondent to any other Workplace,
- Grant leave to the Aggrieved Individual, in addition to the leave which the Aggrieved Individual would be otherwise entitled to,
- Prevent the Respondent from assessing Aggrieved Individual’s work performance,
- Grant such other relief as may be appropriate,

10. IMPLEMENTATION OF RECOMMENDATIONS OF THE INTERNAL COMPLAINTS COMMITTEE :

The Management will consider the recommendations and findings of the Internal 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 Internal Complaints Committee

11. 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. s

11.1 Criminal Proceedings according to the provisions of law.

12. 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.

13. 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.

13.1 Exceptions

There are no exceptions to this policy.

13.2 Contact

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

14.3 Review

The policy shall be reviewed once in every year.

Annexure -A (Procedure to be followed post filing of complaint with timelines)

Sr. No.	Action	Time period	Timelines considering complaint received as 'Day 0'
1	The AP should lodge complaints to ICC in writing along with supporting documents	-	Day 0
2	Post evaluation of the complaint and establishment of prima facie case, the ICC to seek explanation in writing from RP and also ask to submit his list of documents.	Within a period of 7 working days from receipt of complaint from AP	Day 7
3	RP to revert on the above notice for explanation as specified in Step – 2	Within 10 days from the receipt of the notice	Day 17
4a	Post receipt of reply from RP and evaluating the complaint from AP, the ICC may before initiating an inquiry and at the request of the AP, take steps to settle the matter between AP and RP through conciliation, provided that no monetary settlement shall be made on a basis of conciliation	Within 90 days of the complaint being filed by the AP	Day 90
4b	ICC to initiate and complete inquiry in either of the cases: (i) Should the conciliation as step is not agreed by the AP. (ii) If the conciliation fails, or if AP or RP insist for inquiry		
5	ICC to submit inquiry report with findings and recommendations to the management for implementation	Within 10 days of completion of inquiry	Day 100
6	ICC would forward a copy of report to AP and RP	Within 60 days of the completion of the inquiry	Day 160
7	If the AP is not convinced, the AP can lodge a criminal complaint	-	-