

# **Policy on Prevention of Sexual Harassment**

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| <b>Name of Document</b>                       | <b>Policy on Prevention of Sexual Harassment</b>   |
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| <b>Group Level/ Sector Level</b>              | Mahindra & Mahindra Ltd  |
| <b>Issuing Authority</b>                      | <b>Mr. Ruzbeh Irani</b><br>President (Group Human Resource & Communications), Member of the Group Executive Board  |
| <b>Owner of the document</b>                  | <b>Sheebu David</b><br>Executive Vice President- Corporate HR<br><b>Mr. Rajeshwar Tripathi</b><br>Chief Human Resource Officer-AFS<br><b>Mr. Santanu Sinha</b><br>Vice President - Group legal, Head (Compliance & Governance) |
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Mahindra & Mahindra Ltd. (“Company”) believes in providing a safe, nonhostile and harassment free work environment at all its workplaces. We follow a zero-tolerance approach towards sexual harassment at workplace. Sexual harassment includes any direct or implied unwelcome physical, verbal, or non-verbal conduct of sexual nature.

**Applicability:**

This Policy applies to the Company and its subsidiaries and covers all persons associated with or visiting the company at any of its locations (Workplaces). This is a gender-neutral policy and applies to all employees irrespective of their sexual orientation or preferences.

**Complaints:**

Any complaint of sexual harassment will be investigated and if proved, will be treated as serious misconduct and breach of the Company’s Code of Conduct and Service Rules and appropriate action will be initiated against the concerned persons.

Any aggrieved person who experiences sexual harassment at the Workplace must contact a member of the respective Internal Complaints Committee (ICC) as soon as possible, who will provide guidance regarding filing of a complaint and all reasonable assistance until its disposal. The complaint must be filed in writing with the respective ICC within 3 months from the date of the last incident. Each inquiry of the complaint will be completed within 90 days.

**Confidentiality:**

All information pertaining to any complaint shall be treated with all possible care, sensitivity and discretion and any information capable of identifying any party or witness will not be published, communicated, or made known in any manner to the public, press or media.

**Protection:**

The company will provide protection to the complainant, if the situation requires and if the victim/complainant feels threatened in any manner. During the pendency of an inquiry, the complainant may submit a written request to the Committee for interim reliefs which will be considered and decided by the ICC on a case-to-case basis.

**Conciliatory Settlement:**

If the complainant so requests, before initiating an inquiry, the committee may settle the matter through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation.

**False or Malicious Complaints:**

Any person filing false or malicious complaints or producing any forged or misleading document will be liable to appropriate action, including but not limited to dismissal from service.

**Awareness & Training:**

Company will conduct awareness programs and create forums for dialogue to sensitize all employees about sexual harassment.

Further details about the scope and working of this policy can be found in the Guidelines under POSH Policy.



**Ruzbeh Irani**

President - Group HR & Communications  
and Member of the Group Executive Board