

Name of Document	Policy on Prevention of Sexual Harassment
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Group Level/ Sector Level (Specify sector)	Mahindra & Mahindra Financial Services Ltd.
Issuing Authority	Code of Conduct Committee
Owner of the document	Manish Sinha CHRO – Mahindra Finance & FSS
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Background and Objective :-

Mahindra & Mahindra Financial Services Ltd. (“Company”) believes in providing a safe, non-hostile 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 Committee (IC) 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 IC within 3 months from the date of the last incident. In situations of high workload of any Circle IC, the Chief Ethics Officer may refer a new complaint to another Circle IC or

temporarily assign members from another circle IC to that IC for conducting inquiry. Each inquiry - 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with all possible care, sensitivity and discretion and any information capable of identifying any party or witness will not be published, communicated, or made known in any manner to the public, press or media.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 IC for interim reliefs which will be considered and decided by the IC on a case-to-case basis.

Conciliatory Settlement:

If the complainant so requests, before initiating an inquiry, the IC 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 – can be found in the Guidelines issued under this POSH Policy.

Sd/-

Manish Sinha

CHRO – Mahindra Finance & FSS