

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Name of Document	Policy on Prevention of Sexual Harassment
Version	2
Whether Policy/Code/Manual Guideline	Policy
Group Level/Sector Level	Mahindra EPC Irrigation Limited
Issuing Authority	Abhijit Page – Chief Executive Officer
Owner of the document	Head - HR Department
Date of adoption by Board of Directors	October 23, 2020
Date of last review	16 th January 2026

Mahindra EPC Irrigation Limited ("the 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 including joint ventures 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with all possible care, sensitivity and discretion and any information capable of identifying any party or witness will not be published, communicated, or made known in any manner to the public, press or media.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.

A handwritten signature in black ink is written over a purple circular stamp. The stamp contains the text "Mahindra EPC Irrigation Limited" around the perimeter and "Nashik" in the center, with a small star at the bottom.

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.

For, Mahindra EPC Irrigation Limited


Abhijit Page
Chief Executive Officer



Ref. MEIL/HR/PO/0.5

May 1, 2026

Sub: Appointment of Internal Complaint Committee of POSH

Dear All,

This is to notify you that two members have been separated. As per POSH guidelines, the Internal Complaints Committee is being reconstituted for the remaining duration. The committee's tenure of 3 years was initially from 1st July 2025 to 30th June 2028.

The new committee will continue till 30th June 2028.

Member Name	Member Category
Piyusha Kulkarni	Presiding Officer
Giriraj Mohta	Employee
Snehal Gaikwad	Employee
Madhvendra Pratap Singh	Employee
Vidhya Ekbote	NGO

For Mahindra EPC Irrigation Ltd.

Abhijit Page
Chief Executive Officer