Mahindra EPC Irrigation Ltd.
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MAHINDRA EPC IRRIGATION LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Name of Document	Policy on Prevention of Sexual Harassment
Version	3
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	HR Manager
Date of adoption by Board of Directors	October 23, 2020
Date of last review	October, 2026
Next review date	October, 2029

Mahindra EPC Irrigation Limited ("the Company") is committed to in providing a safe, respectful, non-hostile and harassment-free work environment at all its workplaces. The Company follows a zero-tolerance approach towards sexual harassment and any form of inappropriate conduct that violates the dignity of an individual at workplace. Sexual harassment includes any unwelcome physical, verbal, non-verbal, written, visual, or electronic conduct of sexual nature, whether direct or implied.

Applicability:

This Policy applies to the Company, its subsidiaries, associates, joint ventures and all workplaces under the Company's control. It covers all employees, directors, trainees, apprentices, interns, consultants, contract workers, agency personnel, vendors, customers, visitors, and any other persons associated with or visiting the Company at any of its workplaces.
The Company is committed to ensuring a workplace free from sexual harassment for all individuals. This is a gender-neutral policy and shall apply to all persons, irrespective of their gender, gender identity, sexual orientation or any other protected characteristic.

INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company shall constitute an Internal Complaints Committee ("ICC") at all its administrative units or offices covering each of its administrative offices and units, comprising of 5-10 members by written order. The term of these members should not be more than three years from the date of their nomination. Guidelines for the formation of the committee are given below.

- At least 50% of the ICC members should be women,
- The Chairperson of the ICC should be a lady employee at a senior level,
- At least two (2) employees who are members should be committed to the cause of women or have experience in social work or have legal knowledge,
- One (1) member should be from NGO/associations committed to the cause of women and familiar with issues related to sexual harassment. She/he should be

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paid fees/allowances as decided by the company for holding the proceedings of the ICC.

- Members of the Internal Complaints Committee (ICC) may be contacted through the dedicated email ID: posh_meil@mahindra.com. The names and contact details of the ICC members are provided in Annexure A to this Policy.

Complaints:

Any complaint of sexual harassment shall be investigated promptly and confidentially. If the allegations are substantiated, the same shall be treated as serious misconduct and appropriate disciplinary action shall be taken in accordance with the Company's Code of Conduct and Service Rules
Any aggrieved person may file a written complaint with the Internal Complaints Committee (ICC) within **3 months** from the date of the incident or the last incident. The ICC shall provide necessary assistance and endeavor to complete the inquiry within **90 days** of receipt of the complaint.

The complaint can be submitted to the ICC electronically at: posh_meil@mahindra.com or may be physically submitted to any ICC Member.

Inquiry Process

1. The IC would carry out an inquiry into the complaint received.
2. All efforts should be taken to expedite the process and complete the inquiry as early as possible. The inquiry should be completed within a maximum of 90 days.
3. The IC has powers to
    a. Summon and enforce the attendance of any person and examine him on oath.
    b. Require the discovery and production of documents.

Action during Pendency of Inquiry

1. The Committee shall ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
2. During the period of enquiry, based on a request from the victim, the IC may recommend the Company to
    a. Transfer the victim/respondent to another location/work place.
    b. Grant leave to the victim up to a period of three months (In addition to the leave otherwise entitled).
    c. Restraint the respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer.
    d. Grant any other relief as found suitable by IC.

Confidentiality:

All complaints and related proceedings shall be handled with utmost confidentiality, sensitivity, and discretion. Information relating to a complaint, including the identity of the parties and witnesses, shall not be disclosed, published, communicated, or made

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known to any unauthorized person, including the public, press, or media, except as required by law.

Protection:

The Company shall take appropriate steps to ensure the safety and protection of the complainant against any form of intimidation, retaliation, or victimization. During the pendency of an inquiry, the complainant may submit a written request to the Internal Complaint Committee seeking interim relief, which shall be considered and decided by the ICC on a case-to-case basis.
The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of Sexual Harassment.

Conciliatory Settlement:

At the request of the complainant, the Internal Complaints Committee (ICC) may, before initiating an inquiry, take steps to resolve the matter through conciliation, provided that no monetary settlement shall form the basis of such conciliation.

False or Malicious Complaints:

Any person who knowingly files a false, frivolous, vexatious or malicious complaint or submits any forged, fabricated, falsified or misleading documents in support of a complaint, shall be subject to appropriate disciplinary and/or legal action, including where applicable, termination of employment or 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.

Abhijit Page
Chief Executive Officer

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Annexure A
Internal Complaints Committee (ICC) - Contact Details

Email ID for Complaints and Assistance: posh_meil@mahindra.com

Designation	Name	Contact No.
Presiding Officer	Ms. Piyusha Kulkarni	8530666713
Member	Mr. Giriraj Mohta	9833151994
Member	Ms. Snehal Gaikwad	9975685845
Member	Mr. Madhvendra Pratap Singh	8806784008
NGO	Ms. Vidya Ekbote	9403706934

Note: Any person seeking assistance or wishing to file a complaint under this Policy may contact any member of the Internal Complaints Committee (ICC) or write to **posh_meil@mahindra.com**.