

MAHINDRA LIFESPACE DEVELOPERS LIMITED POLICY ON PREVENTION OF SEXUAL HARASSMENT

(PREVENTION, PROHIBITION AND REDRESSAL)

POLICY ON PREVENTION OF SEXUAL HARASSMENT

BACKGROUND

Mahindra Lifespaces Developers Limited ("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 OF THIS POLICY

This policy applies to:

- i. All Associates, who are employed with the Company and its subsidiaries including but not limited to permanent, contractual or temporary employees ("Employee").
- ii. All Associates, who visit the Premises of the Company for any purpose, such as customers, visitors etc.

This is a gender-neutral policy and applies to all employees irrespective of their sexual orientation or preferences.

SCOPE OF THIS POLICY

This policy would extend to all the locations of the Company. The possible locations could be:


- i. Any of the business locations of the Company; or
- ii. Any external location visited by an Associate due to or during the course of employment with the Company, such as business locations of other organizations/entities, guest houses, hotels etc.; or
- iii. Any mode of transport provided by the Company (or a representative of the Company) to an Associate for undertaking a journey to and from the locations mentioned above.

The definitions (i) — (iii) are together referred to as "Premises".

DEFINITION OF SEXUAL HARASSMENT

A broad definition of sexual harassment consists of any unwelcome physical, verbal or non- verbal conduct of unnecessary, improper or unwelcome sexual nature and may include one or more of the following acts or behavior (whether directly or by implication):

1. Unwelcome sexual advances, demands or requests for sexual favours, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature; or
2. Transmitting any message, by mail, telephone, electronic media including social networking websites etc. which is obscene, lewd, suggestive or blatantly sexual in nature; or
3. Any explicit or implicit communication wherein a sexual favour or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment; or

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4. Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes; or consistent pattern of unnecessary physical contact and advances, staring or targeting unreasonable attention at an individual in day-to-day dealings; or
 5. Any pervasive pattern of behavior which makes women uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation; or vii. Stalking or making repeated unnecessary/unwelcome visits to the place of residence; or
 6. Actual sexual assault.

This is only an indicative list of the possible acts and in no way is exhaustive in nature.

COMPANY APPROACH TO SEXUAL HARASSMENT ISSUES

The Company views all incidents of sexual harassment seriously and follows a zero-tolerance approach towards any act of sexual harassment. All incidents of sexual harassment are prohibited, and any complaint or report of sexual harassment will be investigated and if proved, appropriate action will be taken against the offending person. The nature and seriousness of the offence will be adjudged by the Committee depending on several factors, including the presence of the following circumstances while the aggrieved Associate was being subjected to any acts of sexual harassment:

1. implied or explicit promise of preferential treatment in Associate(s) employment; or
2. implied or explicit threat of detrimental treatment in Associate(s) employment; or
3. implied or explicit threat about Associate(s) present or future employment status; or
4. interferes with Associate(s) work or creating an intimidating or offensive or hostile work environment for Associate(s); or
5. humiliating treatment likely to affect Associate(s) health or safety.

The circumstances enlisted above are not exhaustive. Every proven act of sexual harassment will be treated as misconduct under the service rules and appropriate action will be undertaken for such a misconduct.

COMPLAINTS HANDLING PROCESS

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 appropriate action will be initiated against the concerned persons.

The Company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

1. FORMATION OF INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT

At all Regions comprising of offices and sites of the Company, an "Internal Complaints Committee" ("Committee") will be constituted. The MD & CEO along with the Chief People Officer will be responsible for the formation of the Committee and ensuring that all the complaints are addressed by the Committee. The constitution of the Committee will be as per the provisions of the Act. The names and contact details of the members of this Committee for all locations will be announced and publicly displayed of the same shall be ensured in common areas accessible to employees and visitors, alike.

The Committee will be constituted as per the following guidelines at all the locations of the Company:

Category of the member	No. of members	Comments
Presiding Officer	1	A senior level woman associate to be appointed as Presiding Officer of the Committee
Associate	2 or more	Associates of the Company committed to the cause or having experience in social work or legal knowledge to be nominated as a part of the Committee. One of them should be a HR representative or a person nominated by HR for the location.
NGO or Associations committed to the cause	1	A member from an NGO or associations committed to the cause or a person familiar with the issues relating to sexual harassment to be nominated as a part of the Committee

Please note:

- In case a senior level / woman Associate is not available; the Presiding officer can be nominated from other administrative offices of the Company.
- It is mandatory that at least one-half of the total members of the Internal Complaints Committee so appointed be women members.
- The constitution of the Committee for each location will be announced separately.

2. PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT

Any Associate who experiences sexual harassment at the Premises must file a complaint in writing to the 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. However, this time limit may be extended by the Committee if there are substantial reasons, justifications or circumstances which have prevented the aggrieved Associate from filing this complaint. In the event of the physical or mental incapacity or death of the affected aggrieved Associate, her/his heirs can also file such a complaint on her/his behalf.

- Settlement:** After filing such a complaint, if the aggrieved Associate so requests, prior to initiating an inquiry, the Committee can try to settle the matter through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. If such a settlement is reached, the Committee will record the settlement and action will be taken by the Company as specified in the recommendation. Copies of the settlement will also be provided to the aggrieved Associate and the respondent. However, it is to be noted that where a settlement is arrived at, no further inquiry will be made by the Committee, unless the terms of settlement have not been complied with.
- Inquiry:** If the aggrieved Associate does not request for a settlement then, on receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter.

The Committee shall make the inquiry into the complaint in accordance with the principles of Natural Justice.

A minimum number of 3 members of the Committee, including the Presiding Officer, should be present for conducting the inquiry. Both parties will be given reasonable opportunity to be heard by the Committee. A copy of the findings shall also be given

to both parties to enable them to make representations against the findings before the Committee.

This inquiry will be completed within 90 days. Further, within 10 days of completion of the inquiry, the Committee will formally record the result of the inquiry and forward its recommendations for appropriate action to the concerned officers of the Company who will act upon such recommendations of the Committee within 60 days.

An appeal to the decision of the Committee may be preferred within a period of 90 days to a court or tribunal as may be prescribed under the Act.

- c. **Interim Relief:** Where an inquiry is initiated on a complaint then, if the complainant so desires, she/he can request for any of the following actions to be taken during the pendency of the complaint as an interim measure of relief:
- i. transfer of either of the parties to any other workplace; or
 - ii. grant of leave to the complainant up to a period of 3 months; or
 - iii. restraining the respondent from reporting on the work performance of the complainant or writing her/his confidential report and assign the same to another officer; or
 - iv. Grant such other relief to the complainant as may be prescribed under the Act.

The Committee may provide such recommendations to the Company to implement. The leave granted to the complainant will be in addition to the leave she/he would be otherwise entitled to.

- d. **Procedure to be followed by the Committee for conducting an Inquiry:** For the purpose of conducting an inquiry into any complaint received by it from an aggrieved Associate, the Committee may:
- i. summon and enforce the attendance of any person and examine her/him on oath;
 - ii. require the discovery and production of documents; and
 - iii. perform or require performance of any other such act which may be prescribed under the Act.
- e. **Action against the Offender:** Necessary action, including but not limited to such disciplinary action as may be specified in the terms of employment of the offender(s), will be taken with regard to such offender(s) based on the circumstances and seriousness of the offence. If the Committee so deems fit and appropriate, then it may direct the respondent to pay compensation to the complainant (either through deduction from salary or in case respondent has left the Company or is on leave, then direct payment). If such compensation is not paid, then recovery of this amount will be done as an arrear of land revenue.
- f. **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.
- g. **Invocation of Indian Penal Code:** If the aggrieved person chooses to file a complaint in relation to the offence under the Indian Penal Code or any other applicable law, the Company will provide such assistance as maybe required. Furthermore, the Company may also cause to initiate action, under the Indian Penal Code or any other applicable law, against the offender. In the event that the offender is an Associate of a different entity/organization/company, then if the aggrieved Associate so desires, the Company will cause to initiate action in the workplace at which the incident of sexual harassment took place.

- h. False, Frivolous or Malicious Complaints:** Where the Committee arrives at a conclusion that the allegation against the offender is malicious or the complainant has made the complaint knowing it to be false or has produced any forged or misleading document, then the same will be viewed very seriously by the Company and appropriate action will be taken against such complaints.
- i. Confidentiality of the Complainant:** Any complaints or incidents reported under this policy shall be treated with all possible care, sensitivity and discretion in protecting the sensibilities of the affected person and no information will be divulged publicly or to any third party which can enable identification of the identity of the affected person.

As the Act has come into force from 9th Dec'13, all locations are advised to implement the said policy and ensure adherence to the provisions of the Act and the rules.

- 3. Awareness and Training:** Company will conduct awareness programs and create forums for dialogue to sensitize all employees about sexual harassment.
- 4. Preparation of Annual report and compliance with appropriate Government:** The Committee will prepare the annual report in accordance with Section 21 of the Act which shall contain the following details:
 - i. Number of complaints of sexual harassment received in the year
 - ii. Number of complaints disposed off during the year
 - iii. Number of cases pending for more than 90 days
 - iv. Number of workshops or awareness programs against sexual harassment carried out
 - v. Nature of action taken by the concerned officers of the Company.

The annual report will be submitted to the CGC (Corporate Governance Cell) and to Mr. Tanmoy Roy, Chief People Officer in the Company.

At every location, in the Committee, an HR representative will be nominated. It will be the duty of this person to file annual report with the District Officer notified under Section 5 of the Act by the appropriate Government.

Internal Committee Mahindra Lifespace Developers Limited

Location /Name of the Company in Sector	Presiding Officer / Members / External Representative	Name Email ID Handheld number
Mahindra Towers, Worli Corporate Office MLDL	Presiding Officer	Ms. Parveen Mahtani 9930066335 mahtani.parveen@mahindra.com
	Member	Mr. Tanmoy Roy 9819085870 roy.tanmoy@mahindra.com
	Member	Mr. Deepak Ahluwalia 8879415558 ahluwalia.deepak@mahindra.com
	Member	Ms. Sunita Purushottam 8600134626 purushottam.sunita@mahindra.com
	Member	Mr. Alok Thakur 9717955093 thakur.alok@mahindra.com
	Member	Ms. Bijal Parmar 9699291732 parmar.bijal@mahindra.com
	External Representative	Ms. Shivangi Prasad 9004099796 Shivangi@thelegalswan.com Ms. Pallavi Poswal 9920999255 pallavi@thelegalswan.com

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North Region (Delhi/Gurgaon/Jaipur (all offices and Sites)	Presiding Officer	Ms. Parveen Mahtani 9930066335 mahtani.parveen@mahindra.com
	Member	Mr. Anuj Bindal 9549786672 Bindal.anuj@mahindra.com
	Member	Mr. Ashish Sajwan 9920475549 sajwan.ashish@mahindra.com
	Member	Ms. Anubhuti Malhotra 9920041408 malhotra.anubhuti@mahindra.com
	Member	Ms. Aarti Gujare 9833030318 Gujare.aarti@mahindra.com
	External Representative	Ms. Shivangi Prasad 9004099796 Shivangi@thelegalswan.com Ms. Pallavi Poswal 9920999255 pallavi@thelegalswan.com

Asst

West Region (Mumbai, Pune, Nagpur,Alibaug,Palghar, Kalyan, Ahmedabad)	Presiding Officer	Ms. Sunita Purushtottam 8600134626 purushottam.sunita@mahindra.com
	Member	Ms. Deepak Ahluwalia 8879415558 ahluwali.deepak@mahindra.com
	Member	Ms. Sandesh Pawar 9833142020 Pawar.sandesh2@mahindra.com
	Member	Ms. Anubhuti Malhotra 9920041408 Malhotra.anubhuti@mahindra.com
	Member	Mr. Satadal Nandi 9049996959 nandi.satadal@mahindra.com
	External Representative	Ms. Shivangi Prasad 900409979 shivangi@thelegalswan.com Pallavi Poswal 9920999255 pallavi@thelegalswan.com

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South Region (Chennai, Bengaluru – All Offices and Sites)	Presiding Officer	Ms. Pavitra Vankatesh 9600034832 Venkatesh.pavitra@mahindra.com
	Member	Mr. Prince Gomez 7030284433 gomez.prince@mahindra.com
	Member	Mr. Ashish Sajwan 9920475549 sajwan.ashish@mahindra.com
	Member	Ms. KN Lakshmi 97411676765 kn.lakshmi@mahindra.com
	External Representative	Ms. Shivangi Prasad 900409979 shivangi@thelegalswan.com Pallavi Poswal 9920999255 pallavi@thelegalswan.com

Tanuj K

Approved By

Chief People Officer

29-10-2024