



**Policy on Prevention, Prohibition and Redressal of Sexual
Harassment at Workplace
(POSH Policy)**



Date of Last Revision and approval by the Board of Directors: September 14, 2023

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	2 of 15
Effective Date	14.09.2023

DOCUMENT IDENTIFICATION INFORMATION

Document Name	Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (POSH Policy)
Index	MFL/POSH/POSH Policy
version	Version v.1.3
No of Pages	15
Process owner	Internal Complaints Committee (ICC)
Recommended By	CEO
Approving Authority	Board of Directors
Review Frequency	At least once a year or if significant changes occur to ensure its continuing suitability, adequacy, and effectiveness
Location of the document	ICC
Regulatory/Internal Circular Clause	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Revision/Change History

Author	Reviewer	Version No.	Effective Date	Change Description
		1.1	09/11/2011	Formulated the Policy.
ICC	Presiding Officer - ICC	1.2	18/05/2022	Reviewed by the Board.
ICC	CEO	1.3	14/09/2023	Reviewed the policy by the Board on 14/09/2023 and change in the composition of ICC.

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	3 of 15
Effective Date	14.09.2023

TABLE OF CONTENTS

Sl. No.	Contents	Page. No.
1	Commitment	4
2	Scope	4
3	Objective	4
4	Responsibilities	5
5	Applicability	5
6	Words, Expression and Abbreviations	5
7	Legal Background	6
8	Policy Guidelines	6
9	Constitution of Internal Committee	7
10	Procedures for filing Complaint	8
11	Procedures to be followed post receipt of complaint	9
12	Guidelines to be kept in mind by ICC while recommending action	11
13	Employer (Management of Establishment) to Ensure	11
14	Appeal by the aggrieved person	12
15	Awareness	13
16	False accusation	13
17	Miscellaneous	14
18	Conclusion	14
	Annexure	15

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	4 of 15
Effective Date	14.09.2023

This policy (hereinafter “the Policy”) has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the Policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and in the event of any conflict between the Policy and the provisions of the Act, the provisions of the Act shall prevail.

1. Commitment

Muthoot Fincorp Limited (hereinafter “the Company”) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and in a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, age, nationality, ethnic origin or disability.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment. Sexual harassment at the work place or other than work place if involving an employee or employees is a grave offence and is therefore, punishable.

2. Scope

This policy applies to all categories of employees of the Company all over India, including permanent, management and workmen, temporary, trainee and contracted, at their workplace. This policy proposes a zero-tolerance attitude against any kind of Sexual Harassment or discrimination by any employee during their tenure in the Company towards any women employee of the Company or its Customers, Vendors and Contractors in the workplace.

3. Objective

The objective of this Policy is to create and maintain a safe work environment, free from sexual harassment and discrimination for all its employees as per the guidelines of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013. The Policy

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	5 of 15
Effective Date	14.09.2023

lays down the guidelines and the process to be followed in order to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment, in addition to the matters connected therewith or incidental thereto.

4. Responsibilities

Regarding Sexual Harassment all employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. Applicability

This Policy is known as **Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace** and is applicable to all employees of Muthoot Fincorp Ltd (and / or others coming under the Provisions of the Act), at all locations.

6. Words, Expressions & Abbreviations

In this policy document, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meaning: -

- a) CE – Complainant Employee – Refers to any woman employee (as per section 2(a) of the Act) who has lodged a complaint of sexual harassment at workplace by another employee (hereinafter referred to as 'respondent').
- b) ICC – Internal Complaints Committee. Employers are required to constitute an ICC at each work place with 10 or more employees to receive and address complaints.
- c) Management– Management includes the person or board or committee responsible for formulation and administration of policies for the Company.
- d) RE – Respondent Employee - Refers to any employee against whom the complaint for sexual harassment has been lodged.
- e) Aggrieved woman - In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- (f) Employee - A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	6 of 15
Effective Date	14.09.2023

working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

g) Workplace – Includes all offices, branches and workplace of the Company located anywhere in India. It also includes any places visited by the employees arising out or during the course of employment including transportation approved by the management of the establishment for undertaking the journey.

7. Legal Background

The Parliament of India enacted the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 to lay down mechanisms for prevention of sexual harassment and redressal of Complaints, beside matters connected therewith or incidental thereto. This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”.

8. Policy Guidelines

Sexual harassment is not only a serious misconduct but criminal offence also, which can destroy human dignity and freedom. To promote the well-being of all women employees at the workplace, this Policy envisages as under: -

- Jab zindagi badalni ho*
- a) It shall be the duty of Management of the establishment to prevent or deter the commission of any act of sexual harassment at the workplace.
 - b) Sexual harassment will be considered as misconduct and action will be taken based on the findings of enquiry in this context.
 - c) The definition of sexual harassment is as per Section 2 (n) of the Act and which includes: -
“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely but not limited to: -
 - Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation; or
 - A demand or request for sexual favours; or
 - Making sexually coloured remarks; or

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	7 of 15
Effective Date	14.09.2023

- Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc; or
- Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will; or
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes; or
- Giving gifts or leaving objects that are sexually suggestive; or
- Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

d) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour is deemed sexual harassment: -

- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implicit or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety.
- An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.

9. Constitution of Internal Complaints Committee (hereinafter referred to as ICC)

The Company has constituted an Internal Complaints Committee (ICC) in accordance with section 4 of the Act for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The details of the committee members of ICC and changes therein will be notified from time to time.

The ICC comprises of:

1. Presiding Officer: A woman employed at a senior level in the organization or workplace

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	8 of 15
Effective Date	14.09.2023

2. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge

3. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

4. At least one half of the total members nominated being women

The ICC will be responsible for:

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format

Currently, the ICC comprises of the following members.

Head - Branch Operations	Chairperson
Deputy Vice President, Operations	Member
Associate Vice President 1- Legal	Member
Senior Manager - Legal	Member
External Member	-

10. Procedure for filing a complaint

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to ICC giving details of the sexual harassment meted out to her within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension, in the opinion of the Internal Complaints Committee. The complaint by an aggrieved woman shall be made to the ICC in writing and be sent either by post or e-mail on the id

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	9 of 15
Effective Date	14.09.2023

posh@muthoot.com or given in person to the ICC or any person authorized by ICC. The ICC may, giving reasons to be recorded in writing, extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the set period. Where the employee is unable to make complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may register the complaint. It is however, pertinent to state that where the aggrieved woman is unable to make complaint on account of her physical incapacity a complaint may be filed by:

- a) Her relative or friend; or
- b) Co-worker; or
- c) An officer of the National or State Commission for Women; or
- d) Any person who has knowledge of the incident, with the written consent of the aggrieved woman.

Where the aggrieved woman is unable to make complaint in case of mental incapacity, a complaint may be filed by:

- a) Her relative or friend; or
- b) A special educator; or Page 6 of 14
- c) A qualified psychiatrist or psychologist; or
- d) A guardian or authority under whose care she is receiving treatment or care; or
- e) Any person who has knowledge about the incident jointly with her relative or friend

Note:

- a) Where the aggrieved woman is unable to make a complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
- b) Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

11. Procedure to be followed post receipt of complaint

- a) The committee will go through the complaint and evaluate if there is or not prima facie case of sexual harassment. While doing that, the ICC will keep in mind that the CE is not subjected to inquiry for more than once. However, if the complaint complexity requires that the CE is

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	10 of 15
Effective Date	14.09.2023

to be called more than once for the inquiry, then the utmost sensitivity would be displayed, and adequate precaution would be taken to ensure there is no loss of dignity to CE.

- b) The ICC will initiate a detailed inquiry as deemed fit.
- c) The ICC may, before initiating an inquiry and at the request of CE, take steps to settle the matter between her and the RE through conciliation, provided that no monetary settlement shall be made as a basis for conciliation. Where a settlement has been arrived during conciliation, the ICC shall record the settlement and forward to the Management for ensuring action as recorded under the settlement. The copies of the settlement as recorded shall be provided to both the parties . Where the settlement is arrived at, no further inquiry shall be conducted by the ICC. However, if the terms arrived during conciliation have not been complied with by the RE, the ICC shall proceed to make an enquiry into the complaint.
- d) In case no settlement is arrived the ICC, shall, where the Respondent is an employee, proceed to make enquiry into the complaint in accordance with the provisions of the service rules.
- e) Where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and the copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- f) During the pendency of the inquiry, the ICC shall on the request of the aggrieved woman make recommendations, namely to transfer the aggrieved woman or respondent to another workplace or grant leave to the aggrieved woman upto a period of three months or such other relief as may be prescribed, to the employer. The leave granted herein shall be in addition to the leave that she is otherwise entitled to. On receipt of such recommendation, the employer shall implement the recommendation and send report of such implementation to the ICC.
- g) The ICC shall after completing the inquiry, submit its report within 10 days to the Management with recommendations of the action to be taken.
- h) The submission of the recommendations by the ICC to the employer shall be completed within a period of 90 (ninety) days from the date of receipt of complaint by the ICC and the employer shall act upon the recommendations within sixty days from the receipt of such recommendations

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	11 of 15
Effective Date	14.09.2023

- i) The HR Department will extend full cooperation in facilitating to conduct the proceedings by the ICC

Important: For the purpose of making an inquiry under the Act, the Internal Complaints Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:

- a) Summoning and enforcing the attendance of any person and examining on oath;
- b) Requiring the discovery and production of documents; and
- c) Any other matter which may be prescribed

12. Guidelines to be kept in mind by ICC while recommending action

- a) To conduct the inquiry as per the principles of natural justice and in a confidential manner;
- b) In cases where the ICC has recommended to Management for compensation to be made to the CE, then the said amount shall be deducted from the salary of the RE and paid to the CE or her legal heir/s
- c) In case the employer is unable to deduct from the salary, then the RE may be directed to pay such sum to the CE and if RE fails to pay the sum referred as above, the ICC may forward the order for recovery as an arrear of land revenue to the concerned District Officer and such District Officer shall act within 60 days of receipt by him.

13. Employer (Management of the establishment) to Ensure

- a) That in case there is a complaint against any of the ICC members, Management will have to reconstitute the ICC by removing from the ICC the member against whom there is complaint. In all cases, guidelines as defined by the above clauses would be exclusive of the time taken to reconstitute the said committee.
- b) The Management will provide assistance to the CE if she so chooses to file a police complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- c) The Management will also initiate action under the Indian Penal Code or any other law for the time being in force, against a perpetrator who is not an employee of the Establishment and there is complaint of Sexual Harassment against the said perpetrator in the workplace.

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	12 of 15
Effective Date	14.09.2023

- d) The ICC will submit an annual report to the Management as outlined in the Act and the Management shall record the requisite information in the Company's Annual Report in the applicable format.
- e) The Management will assist in ensuring the attendance of the RE and witnesses before the ICC as the case may be.
- f) The Management will monitor the timely submission of the reports. For this the Management will conduct periodic update meetings with the ICC and the HR dept. to ensure that the said policy is being implemented in letter and spirit.
- g) Provide safe working environment at the work place which shall include safety from persons coming into contact at work place.
- h) Display at a conspicuous place in the workplace the penal consequence of sexual harassment and the order constituting the Internal Committee.
- i) Display at a conspicuous place in the workplace the penal consequence of sexual harassment and the order constituting the Internal Committee.
- j) Organize workshop and awareness programs to educate women employees at regular intervals about the Act, Rules and relevant regulations.
- k) Information regarding the constitution of ICC, details of email ID's, contact number of designated persons, procedure for submitting online complaints, rules, regulation and internal policies are to be made available on the website.

14. Appeal by the aggrieved person

Any person aggrieved by any of the following may file an Appeal to the Managing Director of the Company (MD) or an official authorised by him:

- i) against the finding of the ICC that the allegations against the respondent has not been proved during the enquiry or
- ii) against the finding that the allegation is proved and that action for sexual harassment as misconduct should be taken as per service rules or for deduction of any sum from the salary of the respondent ,or

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	13 of 15
Effective Date	14.09.2023

- iii) if the Management fails to implement the decisions based on the recommendations of the ICC, or
- iv) if the Management fails to recover from the RE the amount determined to be payable to the aggrieved employee or legal heir, or
- v) if the ICC concludes that the allegation of the aggrieved woman is malicious or the aggrieved woman has produced false evidence or forge documents, or
- vi) if the ICC arrived at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading document, or
- vii) when persons entrusted with the duty to handle or deal with the complaint, the enquiry or recommendations, publish the contents of the complaint and the enquiry proceedings in contravention of S. 16 of the Act and are made liable for penalty for contravening S. 16 of the Act. An appeal shall be preferred by the aggrieved person to the Managing Director of the Company (MD) or an official authorised by him within 15 days from the receipt of the report of the ICC and such appeal shall be disposed off within 30 days from the receipt of the appeal by such authority. In case the aggrieved employee is not still satisfied by the outcome of the Appeal, he / she may proceed with legal action as provided under the Act or generally within a period of 90 days of the recommendations.

Jab zindagi badalni ho

15. Awareness

All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.

16. False Accusations

The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by the Company. However, there shall be zero tolerance for any false accusation. If the Internal Complaints Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaints Committee may recommend action to be taken against the person who has made the complaint. In such a case, malicious intent has to be established after an inquiry, before any action

Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	14 of 15
Effective Date	14.09.2023

is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaints Committee concludes has given false evidence or produced forged or misleading documents.

17. Miscellaneous

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so, as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

18. Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media. The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that the Company or any individual concerned may have against any other concerned person and it shall not limit or restrict the rights of any of the concerned persons including the Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

Note: The policy will be overall governed by “The Sexual Harassment of Women at the Workplace (Prevention and Redressal) Act, 2013”. The copy of the Act is available at our Corporate HR office. A format of the complaint is annexed which can be used for preparing complaint.



Document ID	MFL/POSH/POSH Policy
Version No.	v 1.3
Page No.	15 of 15
Effective Date	14.09.2023

Annexure

Format of Complaint regarding Sexual Harassment at Workplace

To,

Internal Complaints Committee,
Muthoot Fincorp Limited,
Muthoot Centre,
Punnen Road,
Thiruvananthapuram, Kerala – 695034.

Madam,

I am working as a _____ at _____ in the establishment. I am constrained to make a complaint of sexual harassment against _____ (full name, designation, place of work).

ADD THE DETAILS OF THE INCIDENT.

I am making the above complaint for appropriate action as contemplated under “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder, and the Company’s policy framed thereunder.

Dated this the _____ day of _____.

Jab zindagi badalni ho

Yours faithfully,

(Signature)

Name, Status (Relationship) and
address of the Complainant.