



MUTHOOT MICROFIN LIMITED

Implementation Framework for Human Dignity and Security Services Policy

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| Purpose | Provides a framework for the implementation of the Board-approved Human Rights Policy, subsection pertaining to Human Dignity and Security Services |
| Version | 1.0 |
| Author | Policy Committee |
| Last Review Date | 18 August 2022 |

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| Policy Owner Ship | Head- HR |
| Effective Date | 18 August 2022 |

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| Policy Approval | CEO |
| Date | 18 August 2022 |

MML's objective is to fully comply with IFC Performance Standard 4 in relation to in relation to the security guards it employs at its offices and branches from various security service providers, and specifically paragraph 12, which states:

"12. When the client retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by its security arrangements to those within and outside the project site. In making such arrangements, the client will be guided by the principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of such workers, and by applicable law. The client will make reasonable inquiries to ensure that those providing security are not implicated in past abuses; will train them adequately in the use of force (and where applicable, firearms), and appropriate conduct toward workers and Affected Communities; and require them to act within the applicable law. The client will not sanction any use of force except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. The client will provide a grievance mechanism for Affected Communities to express concerns about the security arrangements and acts of security personnel."

In order to achieve this objective, the relevant employees of MML that are responsible for engaging and monitoring security service providers shall:

- Shall interview prospective security services providers about their training process to ensure their security guards are trained in principles of proportionality, in the use of force (and if applicable, firearms), and appropriate conduct towards workers and customers; and will review their training syllabi to confirm that the security guards employed by MML are adequately trained;
- Share the United Nations' Code of Conduct for Law Enforcement Officials and the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials with all existing and prospective security services providers, copies of which are attached herewith.
- Not sanction any use of force except when used for preventive or defensive purposes in proportion to the nature and extent of the threat;
- Make reasonable inquiries that these providers have not been implicated in abuses in the past;
- Ensure that employees and customers are aware of MML's existing internal and external grievance mechanism to report any issues or concerns with respect to MML's security arrangements or conduct of the security guards;
- Periodically monitor and review the performance of security guards against the criteria laid out above; and
- Require that all security guards to act within applicable law.

With respect to any new contracts with new security services providers, or the renewal of existing contracts with existing providers, MML will require providers to include an annex to the contract specifying these requirements, a template of which is attached herewith.
