POLICY ON PREVENTION OF SEXUAL HARASSMENT

Approved Date	August 24, 2017
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I. Objective & Scope

This policy applies to all categories of employees of the Company, including permanent management and employees, temporary employees, trainees and employees on contract at their workplace.

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company-related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

The purpose of this policy document is to lay down the processes for investigation and action on a complaint or incident reported or coming to the knowledge of the Management regarding any form of sexual harassment at the workplace.

II. Sexual Harassment

Sexual harassment is any kind of behavior that is unwelcome and/or inappropriate for the workplace. Sexual harassment is a form of sex discrimination. For the purpose of this policy, we adopt the inclusive definition as given by the Supreme Court of India: "*Sexual harassment includes such unwelcome sexually determined behaviour as physical contacts and advances, sexually coloured remarks, showing pornography and sexual demands, whether by words or actions. Such conduct can be humiliating and may constitute a health and safety problem; it is discriminatory when the woman has reasonable grounds to believe that her objection would disadvantage her in connection with her employment, including recruiting or promotion, or when it creates a hostile working environment*".
Thus, Sexual harassment can come in many forms such as,

a) Physical contact and advances,
b) A demand or request for sexual favours,
c) Sexually-coloured or unsavory remarks,
d) Eve teasing,
e) Jokes that are demeaning to women and cause embarrassment,
f) Gender based insults,
g) Unwelcome sexual overtones of any manner,
h) Molestation or displaying pornographic or other derogatory pictures,
i) Sexual innuendo,
j) Use of obscene or vulgar language,
k) Vulgar comments on the appearance and character of a woman,
l) Untoward comments about clothing, personal behavior or a person's body,
m) Gender discrimination and physical and mental harassment at work and
n) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

While the policy is predominantly oriented to the protection of female employees, the same may be applied in the case of reverse harassment of male or transgender employees and same sex harassment.

III. Responsibilities Regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

IV. Procedure

Any employee who is aggrieved needs to lodge a complaint giving the detailed grounds of grievance, before the Committee on Prevention of Sexual Harassment / respective reporting manager/ head of department / Head of HR or any other colleague who will assist the employee to lodge complaint to the appropriate authority.

The complaint should be raised in writing or through email sent from official / personal email id. Behaviour not in a particular incident, but of a generally unacceptable sexual overtone at the workplace can also be reported. Anonymous complaints will also be investigated based on nature and seriousness of the complaint, but actions thereon may be hampered by lack of witnesses or evidence.

V. Constitution of Prevention of Sexual Harassment Committee (PSHC)

Prevention of Sexual Harassment Committee (hereinafter referred to as "PSHC") is constituted on the basis of the following principles.

a) The PSHC should have minimum three members including the Presiding Officer, and the decision of majority of members will be considered as the final decision.
b) Any employee who is directly or indirectly having a stake on the subject matter of the complaint shall not be nominated as PSHC member and alternative member shall be appointed by the Presiding Officer.
c) A lady employee would be nominated as Presiding Officer of the PSHC.

Following are the members of the PSHC.

1. Ms. Manju K- EVP- Resource Planning – Presiding Officer
2. Ms. CS Lakshmi Pradeep – External Member
3. Ms. Rajeena Thomas – Member
4. Mr. Udeesh Ullas (COO) – Member

Whereas the above-mentioned committee has been formed to address all complaints pertaining to sexual harassment at work place, Chief Executive Officer and the Directors of the Muthoot Microfin Limited may reconstitute the PSHC based on the nature of complaints or as expedient and practical.

The PSHC is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VI. Process

a. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the PSHC for redressal of their grievances. The PSHC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

b. Complaints:

i. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the PSHC constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

ii. The Presiding Officer of the PSHC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

iii. If the Presiding Officer of the PSHC determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the PSHC.

iv. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

v. The PSHC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chief Executive Officer as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Chief Executive Officer will ensure corrective action on the recommendations of the PSHC and keep the complainant informed of the same.

Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence

vi. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management

VII. Provision for Appeal

Any person aggrieved by the enquiry findings/decision, may prefer an appeal to the Chief Executive Officer or Directors of Muthoot Microfin Limited, with in a period of 30 days from the date such findings/decision has been communicated to the complainant and the respondent. The appeal should be raised with specific reasons as to why any finding or part thereof is incorrect and shall not be subjective/ generalized. The Appeal may be disposed of by the Chief Executive Officer or Directors relying on the records of original proceedings or by calling for more evidence or witness as he may decide.

VIII. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances

IX. False or Frivolous Complaints

False or frivolous complaints filed only with the intention of maligning the character or reputation of a colleague will attract disciplinary action as applicable to major or grave misconduct.

X. Access to Reports and Documents:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XI. Protection to Complainant / Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XII. Conclusion:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

XIII. Amendments to the Policy

The Board of Directors of the Company has the right to amend or modify this Policy.