



MAHINDRA FIRST CHOICE WHEELS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

(PREVENTION, PROHIBITION AND REDRESSAL)

Name of Document	Policy on Prevention of Sexual Harassment for Women
Version	2.0
State whether Policy/Code/ Manual/ Guideline	Policy
Issuing Authority	Mr. Ashutosh Pandey- Chief Executive Officer
Owner of the document	Mr. Sanjay Jha, Chief Human Resource Officer
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Version History	Revision in entire policy. Aligned with M&M Policy

POLICY ON PREVENTION OF SEXUAL HARASSMENT FOR WOMEN

BACKGROUND

Mahindra First Choice Wheels Limited, including its subsidiary(ies) (collectively referred to as the "Company") endeavours to keep their workplaces safe, transparent and friendly for people to work in. Understanding Employees (defined hereunder) and giving them the confidence that their workplace is fair, transparent and safe has been a core philosophy and to that effect we had a Policy on Prevention of Sexual Harassment for several years. The said policy was redrafted when The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act") was enacted to ensure safe working spaces for women and to build enabling work environments that respect women's right to equality of status and opportunity.

APPLICABILITY

This policy applies to Mahindra First Choice Wheels Limited and its subsidiary(ies). "Appropriate Authority" for this policy shall mean Chief Executive Officer of Mahindra First Choice Wheels Limited.

Mahindra First Choice Wheels Limited

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The policy covers:

- I) All women, who are employed with the Company in India including but not limited to permanent, contractual or temporary employees (hereinafter referred to as "Employee");
- II) All women, who visit the premises of the Company in India for any purpose, such as customers, visitors etc.
- III) All locations of the Company (Workplace). The possible locations could be :
 - a. Any of the business locations of the Company; or
 - b. Any external location visited by an Employee due to or in the course of employment with the Company, such as business locations of other organisations/entities, guest houses, hotels, etc., or
 - c. Any mode of transport provided by the Company (or a representative of the Company) to an Employee for undertaking a journey to and fro from the locations mentioned above.

DEFINITION OF SEXUAL HARASSMENT

A broad definition of sexual harassment consists of any unwelcome physical, verbal or nonverbal 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):

- I) Unwelcome sexual advances, demands or requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature; or
- II) Transmitting any message, by mail, telephone, electronic media including social networking websites etc. which is obscene, lewd, suggestive or blatantly sexual in nature; or
- III) 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
- IV) Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes; or
- V) Consistent pattern of unnecessary physical contact and advances, staring or targeting unreasonable attention at an individual in day to day dealings; or

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- VI) 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
- VIII) Actual sexual assault.

The above is only an indicative list and there can be other acts which can be construed as sexual harassment.

COMPANY'S APPROACH TOWARDS SEXUAL HARASSMENT

The Company views all incidents of sexual harassment seriously and follows a zero-tolerance approach towards any act of sexual harassment. All acts capable of being construed as sexual harassment are prohibited. The principle followed is "innocent till proven guilty" and any complaint or report of sexual harassment will be investigated and if proved, appropriate action will be taken against the offender. The nature and seriousness of the offence will be adjudged by the Committee (defined hereunder) depending on several factors, including the presence of the following circumstances while the Employee was being subjected to any acts of sexual harassment:

- I) Implied or explicit promise of preferential treatment in her employment; or
- II) Implied or explicit threat of detrimental treatment in her employment; or
- III) Implied or explicit threat about her present or future employment status; or
- IV) Interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
- V) Humiliating treatment likely to affect her health or safety.

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

COMPLAINTS HANDLING PROCESS

The Company has established the following process to ensure that any complaint of sexual harassment is dealt with appropriately, sensitively and expeditiously in a fair and transparent manner

1. FORMATION OF INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT

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For all the locations and offices of the Company, an "Internal Complaints Committee" (hereinafter referred to as "Committee") is constituted. The HR Head of Mahindra First Choice Wheels Limited is responsible for the formation of the Committee and ensuring that all the complaints of sexual harassment are addressed by the Committee. The constitution of the Committee is as per the provisions of the Act. All locations of the Company will announce the names and contact details of the members of this Committee and publicly display the same in common areas accessible to Employees and visitors, alike. In case necessitated by circumstances like conflict of interest or sudden spike in the number of complaints, the Presiding Officer of the Committee may request the Appropriate Authority to reconstitute/reassign members to ensure that the investigation is carried in a fair and just manner.

Designation	Number	Qualification
Presiding Officer	1	Senior level woman employee
Members	At least 4 (2 Female and 2 Male)	Employees of the Company preferably committed to the cause of women or who have had experience in social work or have legal knowledge
External member	1	A member from an NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment

Note: At least 50% of the Committee will be women

The names of the members of each Committee will be announced by the Appropriate Authority. In case a senior level woman employee is not available, the Presiding officer can be nominated from other administrative offices of the Company. The names and contact details of the relevant Committee members will be displayed at each workplace.

QUORUM

The quorum for conducting inquiry in each complaint shall be three as below:

Committee Member	Participation in every meeting
Presiding Officer	Mandatory
Members	Three employee members to be selected by the Presiding Officer
External member	Mandatory

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Note: Presiding Officer will ensure that at least 50% of the members are women

TERM OF OFFICE

Each member will hold office for three years only in the Committee from the date of appointment. They will be eligible for reappointment at the discretion of the Appropriate Authority.

RECUSAL

If upon receipt of a complaint or at any stage of the inquiry it comes to light that either the complainant or respondent is related to any of the Committee member or is working in the same chain of command or has any conflict of interest in any other manner, the Presiding Officer shall select the quorum without the member having conflict of interest. In case it is not possible to do so by reason of the person in conflict being the Presiding Officer herself or the external member or the number of members in conflict being such that quorum cannot be formed, the Presiding Officer shall inform the Chief Executive Officer, who shall then appoint suitable members for inquiring into the complaint.

CODE OF CONDUCT FOR ICC MEMBERS

To effectively address workplace sexual harassment complaints in a completely unbiased manner, the ICC is expected to:

1. Have complete knowledge of the 'Prevention of Sexual Harassment' Act and the Company's Policy on Sexual Harassment.
2. The ICC members are expected to uphold the policy not only for execution, but also in their day to day demeanour at workplace and beyond.
3. Investigate the main issues in the complaint based on the information gathered.
4. Treat the complainant and the accused with full respect.
5. Do not pre-judge. No person is right or wrong till the inquiry is complete and a decision is taken. It should reflect in the language and words used by ICC members during and outside of the inquiry.
6. Ensure both the parties are aware of the process of investigation and redressal as well as their rights and responsibilities within it.
7. Ensure that interim findings before conclusion are prepared and shared with parties to enable them to make their representation.
8. Prepare a comprehensive report with findings, testimonies and recommendations.

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9. Refrain from getting aggressive, interrupting or insisting on a graphical description of the event.
10. Show empathy, respect, fairness, receptivity and complete attention towards the parties both in conduct and spirit.
11. Do all such things as are necessary to ensure that all steps are taken necessary for parties, to ensure that they are given a reasonable opportunity to present their case and defend themselves so that no prejudice is caused to either of the parties.
12. Accept that each member could have independent views based on the evidence. Try to come to a common convergence based on facts highlighted during the enquiry – do not influence or coerce each other to agree to a viewpoint. Any of ICC members can finally have and record a “Dissenting View” as well in the final report.
13. Copies of proceeding are given to parties and acknowledgment obtained on a day to day basis.
14. Abstain from discussing regarding the complaint amongst the fellow ICC Members in the presence of the Complainant or the Respondent.
15. Refrain from coaching, guiding or influencing the Witnesses, the Complainant or the Respondent during or outside of the enquiry.
16. Ensure that the details of the complaint are not shared with anyone in the organization or outside apart from relevant people in the hierarchy who have a direct role to play in the process.
17. During a redressal process, the Complaints Committee is required to ensure confidentiality of the case, non-retaliation / intimidation by the other party and recommend interim measures as needed to conduct a fair inquiry.
18. FOR EXTERNAL MEMBER-Cannot solicit or do any business with any part of the organization (including trainings).

LODGING COMPLAINTS OF SEXUAL HARASSMENT

Any aggrieved woman who experiences sexual harassment at the Workplace must file a complaint in writing to Committee within 3 months from the date of the last incident. However, this time limit may be extended by the Committee by another 3 months if there are reasons, justifications or circumstances which, in their opinion, had prevented her from filing the complaint. In the event of the physical or mental incapacity or death of the aggrieved woman, then a complaint filed by other people as prescribed under Section 9 of the Act will be entertained. If the Committee arrives at a conclusion that the complaint is barred by time, it shall not proceed further with the complaint.

SETTLEMENT

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After filing the said complaint, if the aggrieved woman so requests, before initiating an inquiry, the Committee may 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 woman and the respondent. If a settlement is arrived at, no further inquiry will be conducted by the Committee, unless the terms of settlement have not been complied with.

INQUIRY

1. If the aggrieved woman 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.
2. The Committee shall inquire into the complaint in accordance with the Principles of Natural Justice.
3. 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.
4. The Presiding officer will ensure that day to day proceeding are handed over to the parties and due acknowledgement obtained thereon.
5. 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 recommendation for appropriate action to the concerned officers of the Company who will act upon the recommendation within 60 days.
6. A copy of the final report will be made available to both parties.

INTERIM RELIEF

During the pendency of an inquiry, the complainant may submit a written request to the Committee for any of the following as an interim measure of relief:

1. Transfer the aggrieved woman or the respondent to any other workplace, or
2. Grant leave to the aggrieved woman up to a period of 3 months, in addition to her normal leave entitlement, or
3. Restrain the respondent from assessing the aggrieved woman's or the complainant's work performance, or
4. Grant such other relief as may be appropriate

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The Committee will consider the same in the facts and circumstances of the case and decide as to the necessity of such relief. If the Committee recommends to the Company any of the above actions, Company shall carry out the same and inform the Committee.

POWER OF THE COMMITTEE FOR CONDUCTING AN INQUIRY

For conducting an inquiry into any complaint received by it from an aggrieved woman, the Committee may:

1. Summon and enforce the attendance of any person and examine him / her on oath
2. Require the discovery and production of documents; and
3. Perform or require performance of any other such act which may be prescribed under the Act

ACTION AGAINST THE OFFENDER

- a. The Committee may recommend such action necessary to meet the ends of justice as it deems fit, including but not limited to such disciplinary action as may be specified in the terms of employment of the offender (s), based on the circumstances and seriousness of the offence.
- b. 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 by directing payment).
- c. If such compensation is not paid, then recovery of this amount will be done as an arrear of land revenue as per law.

INVOCATION OF INDIAN PENAL CODE

If the aggrieved woman 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 to her as she may require. Furthermore, the Company may also cause to initiate action, under the Indian Penal code or any other applicable law, against the offender. If the offender is an employee of a different entity/organization/Company, then if the aggrieved woman so desires, the Company will cause to initiate action in the workplace at which the incident of sexual harassment took place.

FRIVOLOUS OR MALICIOUS COMPLAINTS

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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 complainant.

CONFIDENTIALITY

Any complaints or incidents reported under this policy shall be treated with all possible care, sensitivity and discretion and any information pertaining to the contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken by the employer will not be published, communicated or made known in any manner to the public, press or media. For creating awareness, the Company may disseminate information through internal communication after ensuring that the particulars have been so changed that identification of the aggrieved woman and witnesses is not possible.

ANNUAL REPORT BY COMMITTEE

Each Committee will prepare and submit to the Chief Human Resource Officer of the Company an annual report for each calendar year containing the following details:

- a) Number of complaints of sexual harassment received in the year
- b) Number of complaints disposed off during the year
- c) Number of cases pending for more than ninety days
- d) Number of workshops or awareness programs against sexual harassment carried out
- e) Nature of action taken by the concerned officers of the Company.

The responsibilities of the Chief Human Resource Officer of the Company will be to ensure the following:

- a. Review of this Policy from time to time to ensure that the same is in line with the law of the land.
- b. Conduct awareness programs and create forums for dialogue to sensitize all Employees about the provisions of the Act and this Policy.
- c. Conduct seminars and workshops for the Committee members.
- d. Receive from Committee, upon conclusion of inquiry, all documents and evidence pertaining to each complaint and preserve the same in a secure manner to ensure strict confidentiality.

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- e. Submit the Annual Report with the respective the District Officer notified under Section 5 of the Act by the appropriate Government.

Sanjay Jha
Chief Human Resource Officer

Mahindra First Choice Wheels Limited

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POLICY ON PREVENTION OF SEXUAL HARASSMENT

(PREVENTION, PROHIBITION AND REDRESSAL)

Name of Document	Policy on Prevention of Sexual Harassment for All Employees other than Females
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Version History	Revision in entire policy. Aligned with M&M Policy

POLICY ON PREVENTION OF SEXUAL HARASSMENT FOR ALLEMPLOYEES OHER THAN FEMALES

BACKGROUND

Mahindra First Choice Wheel Limited including its subsidiary(ies) (collectively referred to as the “Company”), endeavours to keep their workplaces safe, transparent and friendly for people to work in. Understanding Employees (defined hereunder) and giving them the confidence that their workplace is fair, transparent and safe has been a core philosophy and to that effect we had a Policy on Prevention of Sexual Harassment for several years.

APPLICABILITY

This policy applies to all employees other than female employees of Mahindra First Choice Wheels Limited and its subsidiary(ies). The Company has a separate policy aimed at addressing issues relating to sexual harassment of women at the workplace. “Appropriate Authority” for this policy shall mean Chief Executive Officer of the Company. The policy covers:

All employees other than female employees who are employed with the Company in India in permanent, contractual or temporary capacity (hereinafter referred to as “Employee(s)”).

All locations of the Company (Workplace). The possible locations could be:

- a. Any of the business locations of the Company; or

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

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):

- I) Unwelcome sexual advances, demands or requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature; or
- II) Transmitting any message, by mail, telephone, electronic media including social networking websites etc. which is obscene, lewd, suggestive or blatantly sexual in nature; or
- III) Any explicit or implicit communication wherein a sexual favor 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
- IV) Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes; or
- V) Consistent pattern of unnecessary physical contact and advances, staring or targeting unreasonable attention at an individual in day to day dealings; or
- VI) Any pervasive pattern of behavior which makes an individual 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
- VIII) Actual sexual assault.

The above is only an indicative list and there can be other acts which can be construed as sexual harassment.

COMPANY'S APPROACH TOWARDS SEXUAL HARASSMENT

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The Company views all incidents of sexual harassment seriously and follows a zero-tolerance approach towards any act of sexual harassment. All acts capable of being construed as sexual harassment are prohibited. The principle followed is “innocent till proven guilty” and any complaint or report of sexual harassment will be investigated and if proved, appropriate action will be taken against the offender. The nature and seriousness of the offence will be adjudged by the Committee (defined hereunder) depending on several factors, including the presence of the following circumstances while the Employee was being subjected to any acts of sexual harassment:

- I) Implied or explicit promise of preferential treatment in his employment; or
- II) Implied or explicit threat of detrimental treatment in his employment; or
- III) Implied or explicit threat about his present or future employment status; or
- IV) Interferes with his work or creating an intimidating or offensive or hostile work environment for him; or
- V) Humiliating treatment likely to affect his 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 misconduct.

COMPLAINTS HANDLING PROCESS

The Company has established the following process to ensure that any complaint of sexual harassment is dealt appropriately, sensitively and expeditiously in a fair and transparent manner

1. INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT

At all the locations and offices of the Company, an "Internal Complaints Committee" (hereinafter referred to as "Committee") has been constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act"). The same Committee shall have the power to deal with complaints under this policy. In case necessitated by circumstances like conflict of interest or sudden spike in number of complaints, the Presiding Officer of the Committee may request the Appropriate Authority, to reconstitute/reassign members to ensure that the investigation is carried in a fair and just manner.

COMPOSITION

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The Committee will have the following members:

Designation	Number	Qualification
Presiding Officer	1	Senior level woman employee
Members	At least 4 (2 Females and 2 Males)	Senior Employees of the Company
External member	1	A member from an NGO or association or a person familiar with the issues relating to sexual harassment

The names of the members of each Committee will be announced by the Appropriate Authority.

The names and contact details of the relevant Committee members will be displayed at each workplace.

QUORUM

The quorum for conducting inquiry in each complaint shall be three as below:

Committee Member	Participation in every meeting
Presiding Officer	Mandatory
Members	Three employee members to be selected by the Presiding Officer
External member	As deemed necessary by the Presiding Officer

TERM OF OFFICE

Each member will hold office for three years only in a Committee from the date of appointment. They will be eligible for reappointment in the same or another Committee at the discretion of the Appropriate Authority.

RECUSAL

If upon receipt of a complaint or at any stage of the inquiry it is comes to light that either the complainant or respondent is related to any of the Committee member or is working

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in the same chain of command or has any conflict of interest in any other manner, the Presiding Officer shall select the quorum without the member having conflict of interest. In case it is not possible to do so by reason of the person in conflict being the Presiding Officer herself or the external member or the number of members in conflict being such that quorum cannot be formed, the Presiding Officer shall inform the Appropriate Authority, who shall then appoint suitable members for inquiring into the complaint.

CODE OF CONDUCT FOR ICC MEMBERS

To effectively address workplace sexual harassment complaints in a completely unbiased manner, the ICC is expected to:

1. Have complete knowledge of the Organizational Policy on Sexual Harassment
2. The ICC members are expected to uphold the policy not only for execution, but also in their day to day demeanour at workplace and beyond.
3. Investigate the main issues in the complaint based on the information gathered
4. Treat the complainant and the accused with full respect.
5. Do not pre-judge. No person is right or wrong till the inquiry is complete and a decision is taken. It should reflect in the language and words used by ICC members during and outside of the inquiry.
6. Ensure both the parties are aware of the process of investigation and redressal as well as their rights and responsibilities within it
7. Ensure that interim findings before conclusion are prepared and shared with parties to enable them to make their representation
8. Prepare a comprehensive report with findings, testimonies and recommendations
9. Refrain from getting aggressive, interrupting or insisting on a graphical description of the event
10. Show empathy, respect, fairness, receptivity and complete attention towards the parties both in conduct and spirit
11. Do all such things as are necessary to ensure that all steps are taken necessary for parties, to ensure that they are given a reasonable opportunity to present their case and defend themselves so that no prejudice is caused to either of the parties
12. Accept that each member could have independent views based on the evidence. Try to come to a common convergence based on facts highlighted during the enquiry – do not influence or coerce each other to agree to a viewpoint. Any of ICC members can finally have and record a “Dissenting View” as well in the final report.
13. Copies of proceeding are given to parties and acknowledgment obtained on a day to day basis.
14. Abstain from discussing regarding the complaint amongst the fellow ICC Members in the presence of the Complainant or the Respondent

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15. Refrain from coaching, guiding or influencing the Witnesses, the Complainant or the Respondent during or outside of the enquiry
16. Ensure that the details of the complaint are not shared with anyone in the organization or outside apart from relevant people in the hierarchy who have a direct role to play in the process.
17. During a redressal process, the Complaints Committee is required to ensure confidentiality of the case, non-retaliation / intimidation by the other party and recommend interim measures as needed to conduct a fair inquiry.
18. FOR EXTERNAL MEMBER: Cannot solicit or do any business with any part of the organization (including trainings).

LODGING COMPLAINTS OF SEXUAL HARASSMENT

Any Employee who experiences sexual harassment at the Workplace must file a complaint in writing to the respective Committee within 3 months from the date of the last incident. However, this time limit may be extended by the Committee by another 3 months if there are reasons, justifications or circumstances which, in their opinion, had prevented him from filing the complaint. In the event of the physical incapacity of the Non-Female Employee, then a complaint may be filed by his relative or friend or his co-worker or any person who has knowledge of the incident, with the written consent of the Employee. In the event of the mental incapacity of the Employee, then a complaint may be filed by his relative or friend or a special educator or a qualified psychiatrist or psychologist or the guardian or authority under whose care he is receiving treatment or care or any person who has knowledge of the incident jointly with his relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care he is receiving treatment or care. In case the Employee for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his written consent. In case the Non-Female Employee is dead, a complaint may be filed by any person who has knowledge of the incident with the written consent of his legal heir.

If the Committee arrives at a conclusion that the complaint is barred by time, it shall not proceed further with the complaint and shall forward the same to Group HR for necessary inquest under the Code of Conduct.

SETTLEMENT

After filing the said complaint, if the aggrieved Employee so requests, before initiating an inquiry, the Committee may settle the matter through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. If such a settlement

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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 Employee and the respondent. If a settlement is arrived at, no further inquiry will be conducted by the Committee, unless the terms of settlement have not been complied with.

INQUIRY

1. If the Employee 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
2. The committee shall inquire into the complaint in accordance with the Principles of Natural Justice
3. 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
4. The Presiding officer will ensure that day to day proceeding are handed over to the parties and due acknowledgement obtained thereon
5. 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 recommendation for appropriate action to the concerned officers of the Company who will act upon the recommendation within 60 days
6. A copy of the final report will be made available to both parties

INTERIM RELIEF

During the pendency of an inquiry, the complainant may submit a written request to the Committee for any of the following as an interim measure of relief:

1. Transfer the Employee or the respondent to any other workplace, or
2. Grant leave to the Employee up to a period of 3 months, in addition to his normal leave entitlement, or
3. Restrain the respondent from assessing the Employee's or the complainant's work performance, or
4. Grant such other relief as may be appropriate

The Committee will consider the same in the facts and circumstances of the case and decide as to the necessity of such relief. If the Committee recommends to the Company any of the above actions, Company shall carry out the same and inform the Committee.

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POWER OF THE COMMITTEE FOR CONDUCTING AN INQUIRY

For the purpose of conducting an inquiry into any complaint received by it from an Employee, the Committee may:

1. Summon and enforce the attendance of any person and examine him / her on oath
2. Require the discovery and production of documents; and
3. Perform or require performance of any other such act which may be prescribed under the process

ACTION AGAINST THE OFFENDER

Committee may recommend such action necessary to meet the ends of justice as it deems fit, including but not limited to such disciplinary action as may be specified in the terms of employment of the offender (s), based on the circumstances and seriousness of the offence

INVOCATION OF INDIAN PENAL CODE

If the Employee 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 to him as he may require. Furthermore, the Company may also cause to initiate action, under the Indian Penal code or any other applicable law, against the offender. If the offender is an employee of a different entity/organization/company, then if the Employee so desires, the Company will cause to initiate action in the workplace at which the incident of sexual harassment took place.

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 complainant.

CONFIDENTIALITY

Any complaints or incidents reported under this policy shall be treated with all possible care, sensitivity and discretion and any information pertaining to the contents of the complaint, the identity and addresses of the Employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the

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Committee and the action taken by the employer will not be published, communicated or made known in any manner to the public, press or media.

For creating awareness, the company may disseminate information through internal communication after ensuring that the particulars have been so changed that identification of the Employee and witnesses is not possible.

RESPONSIBILITIES OF THE CHIEF HUMAN RESOURCE OFFICER

The responsibilities of the Chief Human Resource Officer of the Company will be to ensure the following:

- a. Review of this Policy from time to time.
- b. Conduct awareness programs and create forums for dialogue to sensitize all Employees about the provisions of the Act and this Policy.
- c. Conduct seminars and workshops for the Committee members.
- d. Receive from Committee, upon conclusion of inquiry, all documents and evidence pertaining to each complaint and preserve the same in a secure manner to ensure strict confidentiality.

Sanjay Jha
Chief Human Resource Officer

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