

# **Corporate Policy on Sexual Harassment**

4<sup>th</sup> February, 2013

## A. Background

As an organization we are committed to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations between officers. Discrimination and harassment of any type are strictly prohibited. As a company, we have a very good record of ensuring this culture as part of our existing human resource management and officer relation practices.

We have also ensured that no officer is disadvantaged by way of gender discrimination. We would, however, like to now ensure that there is absolute clarity on the important and sensitive issue of sexual harassment. This note therefore announces the company's approach to the issue of sexual harassment and its policy for dealing with any incidence of the same.

## B. Scope of Policy

This policy applies to all individuals who are employed in permanent, contractual or temporary capacity at any business location of Mahindra Sanyo Special Steel Private Limited (MSSSPL). This policy document is integral part of the Corporate Policy as adopted by the Mahindra & Mahindra Limited (M&M). As part of the Mahindra group, this policy is being followed by MSSSPL to establish a similar approach in dealing with this issue.

## C. Definition of Issue

A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:

- Unwelcome sexual advances, 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
- Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature.
- 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.
- Sexually charged jokes or remarks and behavior which have sexually oriented innuendo
- Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings.
- Any pervasive pattern of behavior which makes officers uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation
- Actual sexual assault

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

## D. Company Policy on Sexual Harassment

The Company policy is to totally prohibit any form of sexual harassment in the way officers behave with each other. This applies equally to relations between superior and subordinates as well as between peers. Any incident of sexual harassment will be viewed extremely seriously. A complaint or report of sexual harassment will be immediately investigated and appropriate action will be taken against the offending officer or officers. Such action will depend on the nature and seriousness of the offence and will include strict disciplinary action including termination of service.

## E. Complaints handling process

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

### I) Complaints Committee for Sexual Harassment of MSSPL

The MSSPL has established a Complaints Committee for Sexual Harassment headed by Mr. Alfred Osta, Executive Vice President – HR & Corporate Governance Cell member (Systech Sector) and consists of MSSPL location representatives. The names of the members of this Committee and their contact details are given below

Name & Designation	Company Name	Contact Details
Mr. Alfred Osta Executive Vice President – HR & Systech Corporate Governance Cell Member	Mahindra & Mahindra Ltd - Systech Sector	Direct Telephone: 022-4936354 Mobile: 9867001794 Email : <a href="mailto:osta.alfred@mahindra.com">osta.alfred@mahindra.com</a>
Mr. Uday Gupta Managing Director	Mahindra Sanyo & Special Steel Pvt. Ltd.	Direct Telephone: 02192 -260501 Mobile: 9922949938 Email : <a href="mailto:gupta.uday@mahindra.com">gupta.uday@mahindra.com</a>
Ms. Hemangi Sharma Manager – Operations and Member of Sexual Harassment Committee - MSSPL	Mahindra Sanyo & Special Steel Pvt. Ltd.	Direct Telephone: 02192-260690 Mobile: 8975258600 Email : <a href="mailto:sharma.hemangi@mahindra.com">sharma.hemangi@mahindra.com</a>

## II) Complaints Committee for Sexual Harassment of M&M

The M&M has established a Complaints Committee for Sexual Harassment headed by Ms. Prochie Mukherjee - Sr. Vice President and Chief of Staff to the Vice-Chairman & Managing Director and consisting of five other senior officers. The names of the members of this Committee and their contact details are given below.

Name	Contact Details
Ms. Prochie Mukherjee Sr. Vice President Chief of Staff to Vice Chairman & Managing Director Office	Direct Telephone: 022-4931661 Mobile: 9892069981 Email : <a href="mailto:mukherjee.prochie@mahindra.com">mukherjee.prochie@mahindra.com</a>
Mr. C Krishnadas	Direct Telephone: 022-4972841 Mobile: 9892012627 Email : <a href="mailto:krishnadas.cc@mahindra.com">krishnadas.cc@mahindra.com</a>
Ms. Beroz Gazdar	Direct Telephone: 022-24915009 Mobile: 9987211300 Email : <a href="mailto:gazdar.beroz@mahindra.com">gazdar.beroz@mahindra.com</a>
Ms. Roshni Sagreiya	Direct Telephone: 022-24961648 Mobile: 9821234529 Email : <a href="mailto:sagreiya.roshni@mahindra.com">sagreiya.roshni@mahindra.com</a>
Ms. Sushama Mokashi	Direct Telephone: 022-24903462 Mobile: 9821341672 Email : <a href="mailto:mokashi.sushama@mahindra.com">mokashi.sushama@mahindra.com</a>

Mr. Rajeev Dubey, President - Human Resources & Corporate Services and Member of the Group Management Board, will provide all necessary support to the work of this Committee.

The Committee may seek the advice of any NGO or third party who it feels will be able to provide special assistance to the Committee in dealing with such issues.

## F. Process for dealing with incidents of sexual harassment

- Any officer who experiences sexual harassment can ***get in touch with any member of the MSSPL or M&M Sexual Harassment Committee whose contact details are provided above*** for convenient and confidential access. Alternatively, the affected officer may approach any senior officer at the location and such senior officer will be expected to inform the Head of Systech Sector Sexual Harassment Committee immediately. All such complaints shall be in writing with full details of the incident.
- On receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the effected officer. The officer or officers, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee.
- The result of this investigation will be formally recorded and communicated to the Vice-Chairman & Managing Director of M&M along with a recommendation for appropriate action.
- The Committee will normally complete this process and make its formal recommendation within 21 days after receiving the complaint unless there are exceptional circumstances.
- Necessary action will then be taken with regard to the offending officer or officers based on the circumstances and seriousness of the offence.
- Where the Company is legally advised that any such incident constitutes a criminal offence, the Company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved officer directly takes any action, against the offending officer, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved officer, shall be entitled to, suo moto, start the internal enquiry / investigation and recommend appropriate action.
- The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and appropriate action taken against such complainants.
- If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior officers concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.
- Heads of departments and senior officers will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.

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