

**FOR
MINION VENTURES PRIVATE LIMITED (“KredX”)
AND ITS
GROUP COMPANIES**

Applicability of MVPL Policies to Group and Subsidiary Companies
All policies of MVPL shall be applicable to the employees of its Group and Subsidiary Companies. For ease of reference and uniform application, any mention of “MVPL” in such policies shall be deemed to include the respective Group or Subsidiary Company, and the reference to “MVPL” shall be substituted accordingly when applying the policy to such entities.

Policy on Prevention of Sexual Harassment at Workplace

| Version | Date | Author | Reviewed | Status |
|---------|----------------|-----------------------|--------------|--------|
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Introduction:

Scope:

This policy applies to all categories of employees of the Company, including permanent employees, temporaries, interns and employees on contract as well as any person visiting the Company's workplace. The Company will not tolerate sexual harassment, if engaged in by or towards any clients, visitors or any other business associates. The workplace includes:

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

Definition of Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favors,
3. verbal abuse or 'joking' that is sex-oriented,
4. any other any other type of sexually-oriented conduct as provided in the definition of Sexual harassment in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Responsibilities regarding Sexual Harassment:

1. Responsibilities of individuals:

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Refusing to participate in any activity which constitutes harassment
- Supporting the person to reject unwelcome behavior
- Acting as a witness if the person being harassed decides to lodge a complaint
- All are encouraged to advise others of behavior that is unwelcome.

2. Responsibilities of managers:

All managers must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

Complaint Mechanism:

An appropriate complaint mechanism in the form of “Internal Complaints Committee (IC)” has been created in the Company for redressal of the complaint made by the victim.

Internal Complaints Committee:

The Company has instituted an Internal Complaints Committee (IC) for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the IC will comprise of the following five members:

1. Presiding Officer
2. HR Manager
3. One member from the Management team
4. One external member, familiar with the issues relating to sexual

harassment The Internal Complaints Committee 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

Sexual Harassment Redressal Procedure:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Complaints:

Any person with a harassment concern may make a formal complaint to any member of the Internal Complaint Committee. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days but no later than 3 months from the date of occurrence of the incident, sent in a sealed envelope along with 6 copies of the complaint. Alternatively the person with a harassment concern can send complaint through an email (**ICC@kredx.com**). An employee is required to disclose their name, department, division and location they are working in, to enable the IC members to contact them and take the matter forward, and any other person is required to disclose their name and preferred manner of contact.

B. Conciliation:

If the aggrieved person, before the initiation of an inquiry, requests that the matter be settled on the basis of conciliation, the IC shall seek to settle the matter by way of conciliation. However, no monetary settlement shall be made by way of the conciliation process. On completion of the conciliation process, the IC shall record the settlement in writing and forward the copies of the settlement to the Company, the aggrieved person and the respondent in the matter.

C. Inquiry into Complaint:

1. On receipt of a complaint from an aggrieved person, or on intimation from an aggrieved person that any provision of the settlement arrived at by way of conciliation has not been complied with, the IC shall make an inquiry into the complaint in accordance with the principles of natural justice.
2. During the pendency of the inquiry, the IC may, at its discretion, recommend any interim measures as it deems necessary, including a recommendation that the person accused of sexual harassment be placed on suspension, granting leave to the aggrieved person or such other relief as may be reasonable in accordance with applicable law.
3. The person accused of sexual harassment will be bound to file their reply to the complaint and provide their list of witnesses or any evidence against the complaint to the internal complaints committee within 10 working days of the receipt of the complaint by the person accused of sexual harassment.

4. The Presiding Officer and the Internal Complaints Committee will proceed to investigate the complaint and shall hold hearing where both parties can present their evidence and bring on record witnesses. If the aggrieved person or the person accused of sexual harassment fail to attend the hearings granted by the Internal Complaints Committee on three consecutive hearings, the Committee may pass an ex parte order after giving 15 days notice to the parties or terminate the inquiry proceedings.
5. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall frame a written report containing the findings and recommendations as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Internal Complaints Committee will ensure corrective action and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counseling
 - c. Written warning to the offender and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the offender or the aggrieved person (if they so desire).
 - e. Suspension or termination of services of the employee found guilty of the offence
 - f. Deduction from salary or wages of the person who has committed sexual harassment such sums to be paid to the aggrieved person
 - g. Withholding or promotion or increment
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

For more details, refer to the pictorial representation of the process flow given at the end

Confidentiality:

The Company understands that it is difficult for an aggrieved person to come forward with a complaint of sexual harassment and recognizes the aggrieved person's interest in keeping the matter confidential. To protect the interests of the aggrieved person, the person accused of sexual harassment 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.

Access to Reports and Documents pertaining to Sexual Harassment:

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.

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.

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.

PROCESS FLOW OF FILING A COMPLAINT PERTAINING TO SEXUAL HARASSMENT

Victim makes a formal complaint via mails (icc@kredx.com) or written complaint to the Presiding Officer of the Internal Complaints Committee

IC will conduct a detailed inquiry with the person accused of sexual harassment and the aggrieved person and both may bring on record witnesses if required.

IC will prepare a report of the incident preferably within 90 days of receipt of complaint and within 10 days of preparation of the report forward the same to the Board of Directors

Internal Complaints Committee along with Board of Directors decides on the action to be taken

If it is proven that Sexual Harassment has occurred then suitable action will be taken against the person accused of harassment.

If it is held that no Sexual Harassment has occurred, then the person accused of sexual harassment is exonerated. If it is held that the complaint was false, then suitable action may be taken against the person making the false complaint

P.S.: Email id to address any POSH complaints is icc@kredx.com.



Minions Ventures Pvt. Ltd.

Prevention of Sexual Harassment (POSH) Committee Member list.

The below list of members will be subject to changes.

1. Caroline Roshini (Presiding Officer)
2. Avishek Das
3. Hemant Kumar Joshi
4. Shivangi Gulati
5. Pavithra Srinath (External Member)

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