

MMP INDUSTRIES LIMITED

ANTI-SEXUAL HARASSMENT POLICY

Prevention, Prohibition and Redressal of
Sexual Harassment at the Workplace

*Pursuant to the Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013*

1. Introduction

MMP Industries Limited ("MMP" or "the Company") is committed to providing a safe, respectful, and dignified work environment for all employees. The Company believes that every individual has the right to work without fear of gender bias, prejudice, or sexual harassment.

This Policy has been formulated in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("the Rules"). It prohibits, prevents and deters sexual harassment at the workplace and provides a mechanism for redressal of complaints.

The Company has a zero-tolerance policy towards sexual harassment. Any act of sexual harassment, once proven, will attract strict disciplinary action as set out herein.

2. Scope and Applicability

This Policy applies to all persons working at or for the Company, including:

- Permanent employees, probationers, trainees and apprentices;
- Part-time, contractual, temporary and casual employees;
- Consultants, advisors and persons engaged through staffing agencies;
- Volunteers, interns and persons on deputation;
- Domestic workers employed at the workplace (as per Section 2(o) of the Act).

This Policy applies irrespective of whether the work is carried out at the Company's premises or at any other location in connection with employment, including client sites, off-site assignments, business travel, virtual/remote work environments, and events organised by or on behalf of the Company.

Where a complaint involves a third party (visitor, client, vendor), the Company shall take all reasonable steps to support the aggrieved employee and assist in redressal.

This Policy forms part of the contract of employment or terms of engagement of all persons covered above.

3. What Constitutes Sexual Harassment

Sexual harassment means any unwelcome act or behaviour (whether directly or by implication) of a sexual nature, including but not limited to:

- Physical contact and advances of a sexual nature;
- Demand or request for sexual favours, whether explicitly or implicitly, verbally or through gestures;
- Showing pornography or sexually explicit material in any form;
- Sexually coloured remarks, lewd comments, sexual jokes, offensive personal references;
- Demeaning, insulting or sexually suggestive communications — oral, written, or electronic (including messages, emails, or posts on workplace communication platforms);
- Eve-teasing, stalking, lurid stares, physical confinement against one's will;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

In addition, the following circumstances also amount to sexual harassment under Section 3(2) of the Act:

- (i) Implied or explicit promise of preferential treatment in employment in exchange for submission to sexual conduct;
- (ii) Implied or explicit threat of detrimental treatment in employment if submission to sexual conduct is refused;
- (iii) Implied or explicit threat about the present or future employment status of the complainant;
- (iv) Interference with work or creation of an intimidating, hostile or offensive work environment;
- (v) Humiliating treatment likely to affect the health or safety of the complainant.

Note: Sexual harassment covers conduct at or in connection with the workplace. This includes remote work, virtual meetings, company chat/email platforms, and off-site work events.

4. Internal Complaints Committee (ICC)

Pursuant to Section 4 of the Act, the Company has constituted an Internal Complaints Committee ("ICC") to receive, inquire into, and redress complaints of sexual harassment. The ICC has been constituted in compliance with the following requirements of the Act:

- The Presiding Officer shall be a senior woman employee of the Company (Section 4(1)(a));
- At least two members shall be from amongst the employees, preferably committed to the cause of women or having experience in social work or legal knowledge (Section 4(1)(b));
- One member shall be from an NGO or association committed to the cause of women, or a person familiar with issues relating to sexual harassment — this External Member shall not be an employee of the Company (Section 4(1)(c));
- At least one-half of the total members shall be women (Section 4(2));
- Members shall hold office for a term not exceeding three (3) years from the date of their nomination (Section 4(3)).

The current composition of the ICC is as follows:

Role	Name	Designation / Organisation
Presiding Officer	Rohini Bhandari	Director
Member	T. N. Murthy	Whole Time Director
Member	Lalit Bahndari	Whole Time Director
External Member	Supriya Varma	NGO / Legal Expert (Women's Rights)

Note: The Company shall reconstitute the ICC within the prescribed period whenever a vacancy arises, or upon expiry of the term of any member. The ICC shall not conduct any proceedings unless at least three members (including the Presiding Officer) are present.

The Head of Human Resource Management shall provide all necessary administrative support to the ICC. Any employee may approach any member of the ICC with a complaint.

5. Filing a Complaint

Any aggrieved woman who has been subjected to sexual harassment at the workplace may make a complaint in writing to the ICC.

5.1 Who can file

The complaint must be filed by the aggrieved woman herself. Where she is unable to do so due to physical incapacity, mental incapacity, or death, the following persons may file the complaint on her behalf:

- Her legal heir or any person authorised by her in writing; or
- Any of her relatives, friends, co-workers, or any person who has knowledge of the incident, with her written consent.

5.2 Time limit

The complaint must be submitted within three (3) months of the date of the incident. Where the harassment is of a continuing nature, the complaint must be submitted within three (3) months of the last incident.

The ICC may, for reasons to be recorded in writing, extend the time limit by a further period not exceeding three (3) months, if it is satisfied that circumstances existed which prevented the complainant from filing earlier.

5.3 How to file

A complaint may be made by a written or electronic application addressed to the Presiding Officer or any Member of the ICC. The Company may prescribe a standard format to assist the complainant. The ICC may request additional details to complete the complaint.

The complainant is advised to retain copies of any documents, messages, or other evidence relevant to the complaint.

5.4 Police referral

Important: Where the conduct alleged in the complaint constitutes a cognisable offence under the Indian Penal Code or any other law, the ICC shall be obliged to inform the complainant of her right to initiate criminal proceedings and may, at her request, provide assistance in making a complaint to the appropriate authority / police (Section 9(3) of the Act).

6. Interim Measures Pending Inquiry

On receipt of a complaint, and prior to or during the inquiry, the ICC may, at the request of the aggrieved woman, recommend to the employer any of the following interim measures under Section 12 of the Act:

- Transfer of the aggrieved woman or the respondent to another workplace;
- Grant of leave to the aggrieved woman for up to three (3) months — such leave shall be paid leave and shall be in addition to the leave the complainant is otherwise entitled to;
- Restraint on the respondent from reporting on the work performance of or supervising the aggrieved woman during the inquiry;
- Any other relief as the ICC considers appropriate in the circumstances.

Leave granted under this clause shall not be counted against the complainant's statutory leave entitlement. The complainant may be required to work from home if practicable, keeping in mind the nature of work and the complainant's health and mental condition.

Note: The complainant is reminded that interim measures are to be used in good faith and should not be sought to cause unjustified disruption to the organisation. The ICC retains discretion to determine the appropriate duration and nature of any interim measure.

7. Conciliation

Before initiating a formal inquiry, the ICC may, at the request of the aggrieved woman, take steps to settle the matter by conciliation between the aggrieved woman and the respondent.

The following conditions govern conciliation:

- Conciliation is initiated only at the request of the aggrieved woman — it shall not be imposed.
- No monetary settlement shall be made the basis of conciliation (Section 10(2)).
- If a settlement is reached, the ICC shall record it and provide a copy to both parties.
- No further inquiry shall be conducted once a settlement under this clause has been recorded.
- If the respondent fails to comply with the terms of the settlement, the aggrieved woman may report this to the ICC, which shall proceed with the inquiry as if no settlement had occurred.

8. Inquiry Procedure

8.1 Initiation of inquiry

Where conciliation is not requested, or is attempted but fails, the ICC shall initiate a formal inquiry. The inquiry shall be conducted in accordance with the principles of natural justice, including the following:

- The respondent shall be informed in writing that a complaint has been made against him and provided with the details of the allegations. The complainant's identity shall be disclosed only to the extent necessary for the inquiry.
- Both parties shall be given an equal and fair opportunity to present their case, evidence, and witnesses.
- The ICC shall hear the complainant and the respondent separately.
- The ICC shall summon and question all witnesses cited by either party.
- The ICC may call for specific documents from either party if considered material to the inquiry.

8.2 Powers of the ICC

The ICC has the powers of a Civil Court under the Code of Civil Procedure, 1908, for the purposes of summoning persons, requiring the discovery and production of documents, and any other matter prescribed under Section 11(3) of the Act. Non-cooperation with the ICC is a serious matter.

8.3 Assistance to parties

Both the complainant and the respondent may be assisted by a colleague or associate of their choice during the proceedings. Neither party shall be represented by a legal practitioner during the inquiry without the prior permission of the ICC.

8.4 Timeline

The inquiry shall be completed within ninety (90) days of receipt of the complaint (Section 11(4)).

8.5 Report and action

- The ICC shall prepare a written report of its findings and submit it to the employer (and, where applicable, the District Officer) within ten (10) days of completion of the inquiry (Section 13(1)).
- A copy of the report shall be provided to both the complainant and the respondent.
- The employer shall implement the recommendations of the ICC within sixty (60) days of receipt of the report (Section 13(4)).

9. Disciplinary Action and Compensation

9.1 Where complaint is proven

If the inquiry establishes that the respondent has committed sexual harassment, the ICC may recommend to the employer one or more of the following disciplinary actions:

- Written warning or reprimand;
- Withholding of promotion or increment;
- Transfer to another department or location;
- Suspension with or without pay;
- Termination of employment.

Such disciplinary action is in addition to any criminal or civil remedy the complainant may seek independently.

9.2 Compensation

The ICC may also recommend payment of compensation to the aggrieved woman. The compensation shall be determined having regard to the factors set out in Section 15 of the Act, including:

- The mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
- The loss in career opportunity resulting from the incident;
- Medical expenses incurred for physical or psychiatric treatment;
- The income and financial status of the respondent;
- The feasibility of payment of compensation.

Where the respondent is an employee: compensation shall be deducted from the respondent's salary. If the salary is insufficient, the employer shall pay the compensation and recover it from the respondent as arrears of land revenue (Section 13(3) of the Act).

9.3 Where complaint is found false or malicious

If the ICC, after inquiry, concludes that the complaint was false, frivolous, or malicious, it may recommend disciplinary action against the complainant. The standard of proof is the same — the falsity must be substantiated by evidence.

Important: The mere inability of the complainant to prove a complaint does not constitute a false or malicious complaint. No action shall be taken against a complainant solely because the charge was not established.

9.4 Complaint against the employer / senior management

Where the respondent is the employer, or a person of senior management who cannot be subject to ICC inquiry, the matter shall be referred to the Local Complaints Committee constituted by the District Officer, in accordance with Section 6 of the Act.

10. Confidentiality

All persons involved in the complaint process — including members of the ICC, the complainant, the respondent, witnesses, and HR personnel — are required to maintain strict confidentiality throughout and after the proceedings.

The following information shall not be published, communicated, or disclosed to the public, press, or media in any manner:

- The contents of the complaint;
- The identity and contact details of the aggrieved woman, the respondent, and witnesses;
- Any information relating to conciliation, settlement, or inquiry proceedings;
- The recommendations of the ICC and the action taken by the employer.

Penalty for breach of confidentiality: Any person who breaches confidentiality in contravention of Section 16 of the Act shall be liable for a penalty of Rs. 5,000/- (Rupees Five Thousand Only), in addition to any disciplinary action the Company may take (Section 17 of the Act).

11. Protection Against Retaliation

The Company strictly prohibits retaliation against any person who:

- Files a complaint in good faith;
- Participates as a witness in any inquiry;
- Reports or assists in reporting an incident of sexual harassment.

Any employee who engages in retaliation — including intimidation, threats, adverse employment actions, or any form of discrimination — against a complainant or witness shall be subject to disciplinary action, up to and including termination.

Any pressure, intimidation, or unethical conduct by the respondent directed at the complainant during the inquiry period must be reported immediately to the ICC.

Where the respondent is ultimately found not guilty, the Company shall also take appropriate steps to ensure that the respondent is not subjected to victimisation on account of the complaint, and is treated fairly.

12. Duties of the Employer

In accordance with Section 19 of the Act, the Company shall:

- Provide a safe working environment, free from sexual harassment;
- Display at a conspicuous place in the workplace the penal consequences of sexual harassment and the order constituting the ICC;
- Organise awareness programmes and workshops for employees at regular intervals to sensitise them about the provisions of the Act and this Policy;
- Provide orientation and capacity-building programmes for ICC members and designated persons to handle complaints effectively;
- Treat sexual harassment as a form of misconduct under service rules and initiate appropriate action;
- Monitor timely submission of the annual report by the ICC.

13. Annual Report by the ICC

The ICC shall prepare an annual report at the end of each calendar year and submit it to the employer. The annual report shall contain the following information as required under Section 21 of the Act:

- Number of complaints of sexual harassment received during the year;
- Number of complaints disposed of during the year;
- Number of cases pending for more than ninety (90) days;
- Number of workshops and awareness programmes conducted;
- Nature of action taken by the employer.

The employer shall include the above information in its annual report where such a report is required to be prepared under applicable law.

14. Appeal

Any party aggrieved by the recommendations of the ICC may prefer an appeal before the appropriate authority under Section 18 of the Act within ninety (90) days of the recommendations being communicated.

The appropriate appellate authority shall be as applicable under the relevant service rules or applicable law — typically the Industrial Tribunal, Labour Court, or other competent court / authority having jurisdiction over employment disputes at the location of the workplace.

The Company shall assist any employee who wishes to understand the applicable appeal mechanism.

15. Consequences of Non-Compliance

Note for management: An employer who fails to comply with any provision of the Act — including failure to constitute an ICC, failure to act on recommendations, or failure to file the annual report — is liable for a penalty of up to Rs. 50,000/- (Rupees Fifty Thousand Only) under Section 26 of the Act. Repeated violations may result in cancellation or non-renewal of business licences or registrations.

The Company's management is committed to full compliance with the Act and this Policy and shall treat any violation seriously.

16. Dissemination and Acknowledgement

This Policy shall be:

- Displayed prominently at the workplace and on the Company intranet or internal communication platforms;
- Communicated to every existing employee and to all new recruits at the time of joining;
- Made part of the employee handbook and the terms of employment.

Every employee shall be required to sign an acknowledgement confirming that they have read, understood, and agree to abide by this Policy. New recruits shall sign such acknowledgement as part of the onboarding process.

17. Review and Amendment

This Policy shall be reviewed periodically, and in any event whenever there is a change in law or the Company's organisational structure. Amendments shall be approved by the Board of Directors or such authority as the Board may designate.

Annexure A — ICC Constitution Order

In exercise of the powers conferred by Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the management of MMP Industries Limited hereby constitutes the Internal Complaints Committee with effect from _____ as follows:

Role	Name	Designation / Organisation	Category
Presiding Officer	Rohini Bhandari	Director	Senior Woman Employee
Member	T. N. Murthy	Whole Time Director	Employee
Member	Lalit Bahndari	Whole Time Director	Employee
External Member	Supriya Varma	NGO / Legal Expert (Women's Rights)	NGO / Legal Expert (Women's Rights)

Issued by: _____

Designation: _____

Date: _____

Place: _____

Annexure B — Employee Acknowledgement Form

I, _____, employed as _____ (Designation) in
the _____ Department, hereby acknowledge that:

- I have received, read, and understood the Anti-Sexual Harassment Policy of MMP Industries Limited.
- I understand that sexual harassment at the workplace is a serious misconduct and is prohibited by the Company and by law.
- I agree to abide by the provisions of this Policy at all times.
- I understand that any violation of this Policy may result in disciplinary action up to and including termination of my employment.

Employee Name: _____

Employee Code: _____

Department: _____

Date of Joining: _____

Signature: _____

Date: _____