



Mirae Asset Sharekhan and Group companies [Human Resource Department]

Prevention of Sexual Harassment at the Workplace

[Custodian: Human Resources]

Date of Next Review: 1st January 2026

Date: 5th March 2025

Version: 1.1

Purpose

Mirae Asset Sharekhan is committed to providing a safe, healthy and conducive environment for all persons associated with us. Mirae Asset Sharekhan believes that all employees have the right to be treated with dignity. The environment must promote the confidence to work, to innovate and to perform without fear of harassment. Mirae Asset Sharekhan is committed to creating an environment in which all employees can work together free from sexual harassment.

The policy includes what describes as sexual harassment and the steps that will be taken to address such a situation. Any employee found to have violated the Mirae Asset Sharekhan policy towards prevention of sexual harassment will be subject to immediate and appropriate disciplinary action including but not limited to possible suspension or termination.

1. Definition and Misconduct amounting to sexual harassment:

Sexual harassment comprises unwelcome sexually-determined behavior indicating lack of respect for another person's freedom and trust. Sexual harassment includes, but is not restricted to, physical contact and advances; an explicit or implied demand or request for sexual favours; sexually-coloured remarks; showing pornography; eve teasing; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature. Furthermore any behaviour that would be so perverse and unwelcome that it would be condemnable, would constitute sexual harassment.

2. Who is covered under the policy?

The policy is applicable to all complaints of sexual harassment made by and against all persons irrespective of whether the harassment has taken place during the period of employment or within or beyond the confines of the offices and branches of Mirae Asset Sharekhan. 'Persons' includes employees whether permanent or temporary, extending to persons employed directly or through an agent, or working on voluntary basis or traineeship.

- Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.
- Where the aggrieved person is unable to make a complaint on account of his / her physical incapacity, a complaint may be filed either by – a) His / Her legal heir; or b) His / Her relative or friend; or c) His / Her co-worker; or d) An officer of the National Commission for Women or State Women's Commission; or e) Any person who has knowledge of the incident, with the written consent of the aggrieved person
- Where the aggrieved person is unable to make a complaint on account of his / her mental incapacity, a Complaint may be filed either by – a) His / Her legal Heir; or b) His / Her relative or friend; or c) A special educator; or d) A qualified psychiatrist or psychologist; or e) The guardian or authority under whose care he / she is receiving treatment or care; or f) Any person who has knowledge of the incident jointly with his / her relative or friend or a

special educator or qualified psychiatrist or psychologist guardian or authority under whose care she is receiving treatment or care; or

- Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any other person who has knowledge of the incident, with the

written consent of the aggrieved person.

- Where the aggrieved person is dead, a complaint may be filed by his/her legal heir or any person who has knowledge of the incident, with the written consent of his/her legal heir.

The Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the aggrieved person for making the complaint in writing.

The Internal Committee for the reasons to be recorded in writing may extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the aggrieved person from filing a complaint within the said period.

3. The Redressal Mechanism

The Internal Committee has been constituted to consider and redress complaints of sexual harassment. A central committee has been constituted at Mirae Asset Sharekhan Head Office to consider and redress Complaints of sexual harassment along with entity and / or Zonal level committees.

The Presiding Officer and members of the committee are attached in Annexure 1.

4. Tenure of Committee

The Presiding Officer and every member of the Internal Committee should hold office for such period, not exceeding three years, from the date of their nomination.

Role of the Internal Committee:

For the purpose of making an inquiry, the Internal Committee will have powers similar to the civil court under the Code of Civil Procedure 1908, that is:

- i. Enforcing attendance of any person and examining them on oath
- ii. Requiring the discovery and production of documents
- iii. Any other matter that can be prescribed

a) Preventive:

- i. To create and ensure a safe environment that is free of sexual harassment
- ii. To maintain an atmosphere of equality and gender justice
- iii. To drive prevention and sensitization of sexual harassment
- iv. To share the policy with all employees of Mirae Asset Sharekhan

b) Remedial:

- i. To take notice of complaints about sexual harassment, conduct enquiries, provide assistance and redressal to the complainants, recommend penalties and take action against the accused, if necessary
- ii. To recommend to the concerned authorities follow-up action and monitor the same
- iii. To follow the redressal and enquiry process as described below.

5. Redressal and Enquiry Process:

A. Conciliation:

The Internal Committee may, before initiating an inquiry and at the request of the aggrieved person

take steps to settle the matter between him / her and the respondent through conciliation provided that no monetary settlement shall be made as a basis of conciliation.

Where a settlement has been arrived at under conciliation, the Internal Committee shall record the settlement so arrived and forward the same to the Company / Board of Directors to take action as specified in the recommendation.

The Internal Committee shall provide the copies of the settlement to the aggrieved person and the respondent.

Where a settlement is arrived under conciliation, no further inquiry shall be conducted by the Internal Committee

B. Complaints:

An employee with a harassment concern, who is not comfortable with the conciliation or has exhausted such options, may make a formal complaint to Internal Committee.

A complaint must be registered in writing/via email to any member of the Internal Committee on ic@sharekhan.com. Once such a complaint is received in writing the Internal Committee shall proceed to investigate it as per the procedure specified. The aggrieved person can also provide evidence, if any, to support their complaint.

All complaints made to any committee member must be received and recorded by the Internal Committee, who in turn shall call a meeting of the committee. The Internal Committee will hold a meeting with the aggrieved person within 5 days of the receipt of the complaint, but no later than a week in any case.

If there is a reporting relationship between the aggrieved person and the accused, this reporting relationship will cease to continue.

The Internal Committee is bound to maintain confidentiality during the time of the enquiry (in order not to prejudice the proceedings).

After the report has been finalized, confidentiality should be maintained, if the aggrieved person so desires, by withholding the name and other particulars that would identify them. At the request of the aggrieved person, the Internal Committee can transfer, provide leave of upto 3 months (this is separate from the entitled leaves) or grant any other appropriate relief.

The Internal Committee must inform the accused in writing/via email about the charges made against them and they should be given an opportunity to submit a written explanation within ten days. The accused can provide evidence, witnesses if any, to support their statements.

During the enquiry procedure, the aggrieved person and the accused will be called separately so as to ensure freedom of expression and an atmosphere free of intimidation. The aggrieved person will be allowed to be accompanied by one representative during the enquiry.

The Internal Committee thereafter may make recommendations for disciplinary action if required. In cases of grave grievances, the Internal Committee can seek intervention from the board members.

In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.

In the event that after investigation the complaint is found to be false and it is found that the intention of the aggrieved person is to defame the accused, appropriate disciplinary action will be taken against the complainant.

The entire process of enquiry should be completed within ninety days. A report should be made recording the decision of the committee and recommendations for appropriate disciplinary action. The Internal Committee should submit the report to the board within 10 days after enquiry and thereafter make it available to the aggrieved person and the accused.

Once a complaint has been put forward to the Internal Committee, the aggrieved person should keep the enquiry confidential, till the process has been completed.

The Internal Committee should make efforts to ensure that the aggrieved person and the witnesses are not further victimized or discriminated against while it is dealing with the complaint. The committee shall take action against anyone who intimidates the aggrieved person or members of the committee, during or after the enquiry.

Filing of a grievance/complaint shall not adversely affect the aggrieved person's status/job, salary/promotion, grades etc.

Any Internal Committee member charged with harassment in a written complaint must step down as member during the enquiry into that grievance.

6. What disciplinary action can be taken against the accused?

The disciplinary action will be appropriate with the nature of the violation. Disciplinary action will be taken on a case-by-case basis by the Internal Committee and shall be recommended to a chosen board member. If the allegation against the respondent has not been proved, the Internal Committee may recommend that no action needs to be taken in the matter.

If the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:

- a. Take action for sexual harassment as a misconduct.
- b. To tender written apology to the aggrieved person, issue warning, withholding of promotions/increments of the accused, terminating the accused.
- c. To deduct from salary/wages of the accused or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- d. Provided that in case the company is unable to make such deduction from the salary of the accused due to his/her being absent from the duty or termination of employment it may direct to the respondent to pay such sum to the aggrieved person.

Such action will be taken within 60 days of the receipt of report.

Reference:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition, Redressal) Act, 2013

Version	Date of Issue	Modified by	Validated by	Description
1.0	28 th November 2024	Huzefa Bala	Rajesh Shetty	Updated Policy document and guidelines for Mirae Asset Sharekhan and entities
1.1	5 th March 2025	Huzefa Bala	Rajesh Shetty	IC Committee Changes for various entities

Annexure 1

We present below the constitution of all four IC Committees of the Mirae Asset Sharekhan.

IC Committees of the Mirae Asset Sharekhan group

Internal Complaints Committee	Common members for all entities					Additional member from zones		
	Company	Presiding Officer	External Committee Member	Internal Committee Member	Internal Committee Member	Internal Committee Member	Zone	Internal Committee Member
Sharekhan Limited	Dipali Dalal	Either Dr. Shiney Chib or Dr. Mrs. Anita Butta	Supriya Shetty	Huzefa Bala		North & East	Nidhi Ambardar	Monalisha Mitra
						North West Central	Anahita Vora	Jasmine Marvadi
						West	Mustafa Pardiwala	Rajni Ratan
						South	Rahul Belur	Vidhya R
Espresso Financial Services Pvt Ltd			Mary Dsouza	Udayakiran Joshi	Rahul Vemul	-	-	-
Sharekhan BNP Paribas Financial Services			Rupali Salvi	Ravi Doshi	Suresh Babu	-	-	-
Sharekhan.Com India Pvt Ltd			Nafisa Bharmal	Rajesh Vora	Viral Shah		-	-