

Prevention of Sexual Harassment (POSH) Policy

Version	1.4	Review Date	1 June 2023
Prepared by	Venetia Noronha, AVP – HR	Modified By	Swati Saini, Chief Manager – HR
Reviewed By	Gautam Rao, CVP – HR	Approved by	Shailesh Singh – Senior Director & Chief People Officer Anurag Chauhan – Executive Vice President and Head – Legal

Section	Topic	
I	Overview	<p>a) At Max Life (“Company”), we have Zero tolerance for sexual harassment of any kind at the Workplace or in the Work From Home scenarios, and in particular towards sexual harassment against women (“Sexual Harassment”) as defined in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”).</p> <p>b) We are committed to promoting a working environment that encourages harmony, productivity and individual growth and strives to ensure that no woman is subjected to sexual harassment at the Workplace. The organization is also committed to preventing, prohibiting and taking corrective actions through appropriate redressal mechanisms against any form of sexual harassment at the workplace and in particular Sexual Harassment against women, which is the scope of this Policy.</p> <p>c) This Policy shall override and replace all previous policies in respect of Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace, for women Employees in the Company. All other forms of workplace harassment are dealt with in a separate Policy against workplace harassment.</p> <p>d) This Policy complies with and incorporates the provisions of the POSH Act and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.</p>
II	Objectives	<p>a) To protect every woman employee in the Company from any act of Sexual Harassment at the Workplace as envisaged under the POSH Act and to provide equal opportunity by and through, including but not limited to, the following:</p> <p>i) Policy statement: Formulate, issue and widely disseminate a Policy statement for defining, prohibiting, preventing and addressing redressal of Sexual Harassment of Woman employees.</p> <p>ii) Company Values: Nurture and promote gender sensitive and safe working environment for women employees at Workplace.</p> <p>iii) Processes:</p>

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 T +91-124-4121500 F +91-124-6659811 E Service.helpdesk@maxlifeinsurance.com W www.maxlifeinsurance.com
 Corporate Identity Number (CIN): U74899PB2000PLC045626. IRDAI Reg. No. - 104

Registered office: 419, Bhai Mohan Singh Nagar, Railmajra, Tehsil Balachaur, District Nawanshahr, Punjab - 144 533.

		<ul style="list-style-type: none"> ▪ Promptly, confidentially and sensitively address issues related to Sexual Harassment and lay down the procedures for the resolution, settlement or recommending appropriate disciplinary action for any acts of Sexual Harassment. ▪ Provide mechanisms for assistance and support to aggrieved woman employees in case of Sexual Harassment. ▪ At the request of the Aggrieved Woman, Company may provide her assistance for filing a Complaint under IPC. <p>iv) Governance:</p> <ul style="list-style-type: none"> ▪ Provide all necessary support to the Internal Committee(s) for dealing with the Complaints and conducting Inquiry Proceedings. ▪ Monitor timely submission of Annual Report by the Internal Committee. <p>v) Responsibility of the Company:</p> <ul style="list-style-type: none"> ▪ Ensure fair and transparent investigation and redressal for any complaint of Sexual Harassment. ▪ Assist in securing attendance of Respondent and witnesses before the Internal Committee. ▪ Treat Sexual Harassment as a misconduct under the service rules and initiate action for such misconduct. ▪ Carry out orientation programs and conduct capacity and skill building programs for all Members of the Internal Committee as per the Act. ▪ Organize workshops and awareness programs, inter alia, at regular intervals for sensitizing Employees to the Act
III	Applicability	<p>This Policy shall be applicable to all Employees of Max Life and Visitors at any of the Max Life Offices, including Off-Site Locations (defined below). To be clear, this Policy is applicable to a Max Life Employee who has committed an act of Sexual Harassment at any other Employer’s workplace from whom Max Life has received an investigation report against the Max Life Employee for his action at that Employer’s workplace with recommendation for action against the Max Life Employee.</p>
IV	Definitions	<p>a) "Aggrieved Woman" shall mean any Woman Personnel who may be a victim of Sexual Harassment at Workplace.</p> <p>b) "Annual Report" shall mean the annual report furnished by the Internal Committee to the Employer and the District Officer under the Act.</p> <p>c) "Act" means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal), Act, 2013, and the Sexual Harassment (Prevention, Prohibition and Redressal) Rules, 2013 issued there under (the "Rules") collectively.</p> <p>d) "Applicable Laws" shall mean the Act and IPC, to the extent applicable.</p> <p>e) "Company" means Max Life Insurance Company Limited.</p> <p>f) "Complainant" shall mean an Aggrieved Woman or a person making a Complaint on behalf of an Aggrieved Woman, as per section 9 (2) of</p>

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		<p>the Act.</p> <p>g) "Complaint" shall mean a complaint of Sexual Harassment made as per this Policy.</p> <p>h) "Conciliation" shall mean conciliation proceedings available to an Aggrieved Woman as per the Act.</p> <p>i) "Disciplinary Action" shall mean disciplinary action undertaken in accordance with this Policy and / or Service Rules.</p> <p>j) "Employee" shall include an employee on the payrolls of the Company as well as contract, agents or temporary workers.</p> <p>k) "Employer" shall mean, for purpose of this Policy, the HR of the Company.</p> <p>l) "Inquiry Report" shall mean inquiry report issued by the Internal Committee, containing its Findings and listing the Recommendations to the Employer in respect of a Complaint.</p> <p>m) "False Complaint or Malicious Evidence" shall mean a false Complaint as described in Section IX of this Policy. The following people can be held liable for making False Complaint or submitting Malicious Evidence: (i) an Aggrieved Woman, (ii) a person making a Complaint on behalf of Aggrieved Woman and/or (iii) any witness who has given forged or provided misleading evidence to the Internal Committee.</p> <p>n) "Findings" shall mean the findings of the Internal Committee contained in the Inquiry Report submitted to the Employer by the Internal Committee, post conclusion of Inquiry Proceedings.</p> <p>o) "HR" shall mean the Human Resource Department of the Company.</p> <p>p) "Incident" refers to an incident of Sexual Harassment.</p> <p>q) "IPC" shall mean the Indian Penal Code, 1860.</p> <p>r) "Internal Committee" shall mean a committee set up in accordance with Section VI of this Policy.</p> <p>s) "Inquiry Proceeding (s)" shall mean inquiry process conducted in accordance with Section VIII (e) of this Policy.</p> <p>t) "Max Life Offices" shall mean all offices, locations and administrative units of the Company located at different places, or divisional or sub-divisional level and "Max Life Office" shall mean any one of the same.</p> <p>u) "Member" refers to a member of the Internal Committee appointed as per this Policy for handling the case of Sexual Harassment.</p> <p>v) "Off-Site Locations" shall mean any place, not being a part of Max Life Offices visited by a woman personnel arising out or during the course of her employment, including gaming venue, Company organized event, off- sites and transportation arranged by the Company.</p> <p>w) "Policy" shall mean the Max Life Prevention, Prohibition and Redressal of Sexual Harassment of Women at the Workplace policy.</p> <p>x) "Prescribed Manner" shall mean the process and documentation as is prescribed in this Policy for submission of Complaints.</p> <p>y) "Recommendation" shall mean the recommendations of the Internal Committee in accordance with Section VIII (e) (x) of this Policy.</p> <p>z) "Respondent" refers to a person against whom a Complaint of Sexual Harassment has been lodged by the Complainant.</p>
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		<p>aa) "Service Rules" shall mean the applicable service rules of the Company where the Respondent is working, and shall include, without limitation, all standing orders, code of conduct, policies including the existing Employee Disciplinary Action Process (EDAP) or Agents Disciplinary Action Process (ADAP), as the case may be, guidelines and/or any other communication(s) made by the Company in respect of employment or service conditions or related issues, from time to time. The Service Rules applicable as on date of the Complaint shall be relevant for this Policy.</p> <p>bb) "Settlement" shall mean the terms of settlement arrived at, with the assistance of the Internal Committee, between an Aggrieved Woman and a Respondent post Conciliation as per this Policy.</p> <p>cc) "Sexual Harassment" shall mean sexual harassment as defined in Section V of this Policy.</p> <p>dd) "Victimization" or "Retaliation" in the context of this Policy is any adverse employment action against an Aggrieved Woman because the Aggrieved Woman had lodged a Sexual Harassment complaint or participated in the Inquiry Proceedings related to a Complaint. It would also be applicable in context of any witness who has participated in the Inquiry Proceedings.</p> <p>ee) "Visitor" shall mean any visitor to any Workplace, who is not an Employee of the Company.</p> <p>ff) "Woman/en Personnel" shall include an Employee, client, customer, vendor and / or Visitor.</p> <p>gg) "Workplace" shall mean any of the Max Life Offices or Off – Site Locations, as the case may be.</p> <p>hh) 'Working from Home' shall mean the home or any other place from where the employee may be working in a remote working scenario</p>
<p>V</p>	<p>Sexual Harassment</p>	<p>a) Sexual Harassment maybe one or a series of incidents that occur at a Workplace or while Working from Home, as defined under this Policy, and involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.</p> <p>b) Acts of Sexual Harassment against an Aggrieved Woman include (but are not limited to) unwelcome sexually determined acts or behaviour (whether directly or by implication) listed below:</p> <p>i) unwelcome physical contact on any part of the body, or advances which affronts the dignity of the Aggrieved Woman; and/or</p> <p>ii) a demand or request for sexual favors; and/or</p> <p>iii) making sexually colored remarks; and/or</p> <p>iv) showing pornography; and/or</p> <p>v) any other unwelcome, physical, verbal or non-verbal conduct of sexual nature; and/or</p> <p>vi) implied or explicit promise of preferential treatment in her employment in relation to or connected with any act or behavior of Sexual Harassment; and/or</p> <p>vii) implied or explicit threat of detrimental treatment in her employment in relation to or connected with any act or behaviour</p>

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		<p>of Sexual Harassment; and/or</p> <p>viii) implied or explicit threat about her present or future employment status in relation to or connected with any act or behavior of Sexual Harassment; and/or</p> <p>ix) direct and/ or indirect threat, coercion, suggestion that the Aggrieved Woman being subjected to Sexual Harassment would stand to suffer in terms of employment, promotion within the Company in the event the unwelcome advances are spurned; and/or</p> <p>x) interference with her work or creating an intimidating or offensive or hostile work environment in relation to or connected with any act or behavior of Sexual Harassment; and/or</p> <p>xi) any action, gesture, remark, either by action and/ or verbal, which has suggestive sexual overtones either directly, or by inference. Specifically included are any obscene gestures, songs, jokes, comments which affront the dignity of the Aggrieved Woman; and/or</p> <p>xii) humiliating treatment likely to affect her health or safety in relation to or connected with any act or behavior of Sexual Harassment.</p> <p>xiii) Any behaviour (verbal or non-verbal) through email, phone, any electronic medium or s platforms while Working from Home), which has suggestive sexual overtones either directly, or by inference.</p> <p>Note: The above is only illustrative and not exhaustive and sexual harassment includes such and similar behavior committed by an employee. Harassment can be based on the impact on a purported victim, regardless of whether there is any intent on the part of the respondent.</p>
VI	<p>Process of Registering the Complaint</p>	<p>a. An aggrieved woman may make a written complaint to the Internal Committee via</p> <ul style="list-style-type: none"> ✓ Ethics Hotline (Call 1800-102-6969 or Report at mlic.integritymatters.in using access code MLIC) ✓ Email to Zonal Internal Committee Email ID <ul style="list-style-type: none"> ○ Internal.CommitteeNorth@maxlifeinsurance.com ○ Internal.CommitteeWest@maxlifeinsurance.com ○ Internal.CommitteeSouth@maxlifeinsurance.com ○ Internal.CommitteeEast@maxlifeinsurance.com • Within a period of three months from the date of the incident • If there are a series of incidents within a period of three months from the date of the last incident. <p>b. If an aggrieved woman is unable to make a complaint because of physical or mental incapacity, her legal heir or such other person as permitted by the law may make a complaint.</p> <p>c. If the complaint cannot be made in writing, the Presiding Officer or any Member of the Committee will provide all reasonable assistance so that the written complaint can be made.</p> <p>The Committee for reasons recorded in writing, may extend the time limit by a further period not exceeding three months, if it is satisfied that</p>

		<p>circumstances prevented the filing of a complaint within the first three months.</p> <p>The incident reporting format is available in Annexure II</p>
VII	Constitution of the Internal Committee	<p>The Internal Committee (IC) at Max Life comprises of the following members:</p> <ol style="list-style-type: none"> Presiding Officer: Woman employed at a senior level at the workplace form amongst the employees and designated by the organization to be a Presiding Officer. Member: From amongst employees preferably committed to the cause of women and/or have had experience in social work or legal knowledge Member: From amongst employees preferably committed to the cause of women and/or have had experience in social work or legal knowledge Member: from amongst non-governmental organization or associations committed to the cause of women At least one-half of the members of the IC shall be women, including the Presiding Officer, as prescribed under POSH Act. Tenure of a member should not exceed more than three years. <p>The details of the IC members can be viewed in Annexure I</p>
VII	Inquiry into Complaint	<p>The Committee shall, if the respondent is an employee, make an inquiry into the complaint according to the internal process laid out at Max Life.</p> <p>If the aggrieved woman and the respondent, both are employees at Max Life, they shall during the course of the inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the respondent and the complainant.</p> <p>The Committee has the power to:</p> <ol style="list-style-type: none"> Summon and enforce the attendance of any person for examination; Require discovery and production of documents related to a complaint and Deal with any other matter as may be prescribed by the law. <p>The Committee will complete inquiry within a period of ninety (90) days.</p>
VIII	Manner of Inquiry into the Complaint	<ol style="list-style-type: none"> When making a complaint, the aggrieved woman has to file a written complaint to the Committee together with the supporting documents, and names and addresses of the witnesses. Process of Conciliation <ol style="list-style-type: none"> The Committee before initiating an inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. No monetary settlement shall be made the basis of conciliation. If a settlement is arrived at, the Committee shall record the settlement and send it to Max Life for action to be taken as recommended, and no further inquiry shall be conducted by the Committee. The Committee shall provide copies of the recorded settlement/ or details of the settlement to the aggrieved woman and to the respondent. The Committee will send a copy of the complaint to the respondent with a period of seven (7) days.

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		<p>d. The respondent will file his reply to the complaint along with the supporting documents and names and addresses of witnesses within ten days of receiving the copy of the complaint.</p> <p>e. The Committee's inquiry will be made in accordance with the principles of natural justice.</p> <p>f. The Committee after giving written notice of fifteen (15) days to the party concerned, can terminate an inquiry or give an <i>ex parte</i> decision if either the complainant or the respondent fails, without sufficient cause, to present herself or himself for three (3) consecutive meetings/hearings convened by the Presiding Officer.</p> <p>g. No legal practitioner may represent a party before a Committee proceeding.</p> <p>h. In conducting an inquiry (whether face to face or virtually using digital mediums) a minimum of three members of the Committee including the Presiding Officer shall be present.</p> <p>Interim actions that can be taken while the inquiry is in progress. On the written request by the aggrieved woman, the Committee may recommend that Max Life:</p> <p>i) Transfer the aggrieved woman to another department; or ii) Grant leave to the aggrieved woman iii) Grant such other relief to the aggrieved woman as may be prescribed by law. iv) The respondent to be restrained from reporting on the work performance of the aggrieved woman and assign the same to another person.</p>
IX	Inquiry Report and Recommendations	<p>The Committee shall provide a report of its findings to the Employer within a period of 10 days from the date of completion of the inquiry.</p> <p>The findings will be made available to all the concerned parties (both complainant and respondent)</p> <p>If the conclusion is that:</p> <p>a. The allegations have not been proven, the Committee shall recommend to the Employer that no action is required to be taken in the matter b. If the allegations are proven, the Committee shall recommend to the Employer to take appropriate actions as per the Service Rules of the organization.</p> <p>The recommendations of the IC must be acted upon within 60 (sixty) days of receipt of the recommendations.</p> <p>Note: Malicious intent on the part of the complainant if established during the course of the inquiry, appropriate action may be taken by the Employer post conclusion of the Committee inquiry proceedings, in accordance with the Service Rules of the organization.</p> <p>c. If the Committee concludes that during the inquiry a witness has offered</p>

		false evidence or produced a forged or misleading document, it may recommend that appropriate action may be taken as per the Service Rules of the organization.
X	Prohibition of publication or making known contents of the complaints and inquiry proceedings	The Act also prohibits the publications of the following: details of complaint, the identity or addresses of the aggrieved woman, respondent, witnesses, any information relating to conciliation and inquiry proceedings be made public. The Act also prohibits making known action taken by Max Life or by the District Officer, communicated or made known to the employees, public, press and media in any manner. The law provides for penalty for publication or making known contents of complaint and inquiry proceedings.
XI	Appeal	Any person aggrieved with: a. Recommendations of the Committee on the basis that allegations of sexual harassment have either been proved or not; b. Recommendations for punishment for false or malicious complaints or false evidence; c. Penalty levied for publication or making known contents of complaint and inquiry proceedings; d. Non-implementation of Committee recommendations; may appeal as provided by the law, within a period of ninety (90) days of the recommendations, inter alia, without prejudice to the provisions of the law.
XII	Breach of Policy	Failure to observe the requirements of this policy may result in disciplinary action including and upto dismissal/termination from services.
XIII	Protection in relation to a complaint made in good faith	Anyone found to have retaliated against or victimized the person (s) who make a complaint in good faith or participate in any investigation in relation to alleged sexual harassment will be subject to disciplinary action as per the Service Rules of the organization.
XIV	Reporting Obligations	Annual Report: The Employer shall prepare and submit the Annual Report to the District Officer during each calendar year. The Annual Report shall provide the following information: i) number of Complaints on Sexual Harassment received during the year; ii) number of Complaints disposed of during the year; iii) number of cases pending for more than ninety days; iv) number of workshops or awareness programs against Sexual Harassment carried out; and v) nature of action taken.
XV	Modification and Review of the Policy	The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, or internal policies, to the extent deemed necessary by the Company from time to time. Any such changes or modifications may be notified by the Company to its Employees in due course.

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Annexure I: Constitution of Internal Committee

The Employer shall appoint Members in its Internal Committee (IC), to investigate matters relating to above Policy from time to time by a written order. Below is the current list of IC members (updated on 24 January 2023). The same shall be displayed at appropriate places as per the Act.

Internal Committee North – Internal.CommitteeNorth@maxlifeinsurance.com

<u>Name</u>	<u>Designation</u>	<u>IC Designation</u>	<u>Email ID</u>
Kriti Arora	Vice President	Presiding Officer	Kriti.Arora@maxlifeinsurance.com
Venetia Noronha	Assistant Vice President	Member	Venetia.MeriumNoronha@maxlifeinsurance.com
Shweta Mishra	Assistant Vice President	Member	Shweta.Mishra1@maxlifeinsurance.com
Krunal Shah	Chief Manager	Member	Krunal.Shah@maxlifeinsurance.com
Pankaj Aneja	Assistant Vice President	Member	Pankaj.Aneja@maxlifeinsurance.com
Mamta Sahai*	-	External member	Savera.Mamta@gmail.com

* Amended on annual basis

Internal Committee East – Internal.CommitteeEast@maxlifeinsurance.com

<u>Name</u>	<u>Designation</u>	<u>IC Designation</u>	<u>Email ID</u>
Arpita Saha	Vice President	Presiding Officer	Arpita.Saha@maxlifeinsurance.com
Venetia Noronha	Assistant Vice President	Member	Venetia.MeriumNoronha@maxlifeinsurance.com
Sourish Bandyopadhyay	Assistant Vice President	Member	Sourish.Bandyopadhyay@maxlifeinsurance.com
Suparna Das	Chief Manager	Member	Suparna.Pandey@maxlifeinsurance.com
Shashi Kant Sharma	Assistant Vice President	Member	Shashikant.Sharma1@maxlifeinsurance.com
Sneh Sharma*	-	External member	Sneh@vividhta.in

* Amended on annual basis

Internal Committee West – Internal.CommitteeWest@maxlifeinsurance.com

<u>Name</u>	<u>Designation</u>	<u>IC Designation</u>	<u>Email ID</u>
Tania Madaan	Corporate Vice President	Presiding Officer	Tania.Madaan@maxlifeinsurance.com
Venetia Noronha	Assistant Vice President	Member	Venetia.MeriumNoronha@maxlifeinsurance.com

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Vidyut Halder	Assistant Vice President	Member	Vidyut.Halder1@maxlifeinsurance.com
Rachana Bharaj	Chief Manager	Member	Rachna.Bharaj@maxlifeinsurance.com
Jitendra Gartia	Senior Manager	Member	Jitendra.Gartia@maxlifeinsurance.com
Sneh Sharma*	-	External member	Sneh@vividhta.in

* Amended on annual basis

Internal Committee South – Internal.CommitteeSouth@maxlifeinsurance.com

Name	Designation	IC Designation	Email ID
Vinitha C Gattani	Corporate Vice President	Presiding Officer	Vinita.Gattani@maxlifeinsurance.com
Venetia Noronha	Assistant Vice President	Member	Venetia.MeriumNoronha@maxlifeinsurance.com
Hena Senthil	Chief Manager	Member	Hena.Senthil@maxlifeinsurance.com
Arti Toshakhani	Chief Manager	Member	Arti.Toshakhani@maxlifeinsurance.com
Rekha G S	Associate Regional Manager	Member	Rekha.GS@maxlifeinsurance.com
K. Chandrasekhar	Chief Manager	Member	K.Chandrasekhar@maxlifeinsurance.com
Kanti Joshi*	-	External member	Kanti@sashaindia.com

* Amended on annual basis

The Company's POSH Policy is available at:

<https://disha.maxlifeinsurance.com/> → Company Policies → PoSH - Prevention of Sexual Harassment Policy

E-learning module on Prevention of Sexual Harassment (POSH) is available at:

Disha / Max Life One app → My Learning → Learning Assignments → Prevention of Sexual Harassment (PoSH) – Awareness Module

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Annexure II - Incident Reporting Format

Below are indicative guidelines for filing Complaints and are not mandatory. A complainant may make a Complaint in any other format, provided the same is in writing

Incident Reporting Format	
Name of the Aggrieved Woman with Employee code, if applicable	
Incident Reported against (Name of the Respondent)	
Date of Reporting	
Incident Details	
What happened?	
Who was involved?	
When did the incident take place?	
Where did the incident take place?	
Was it the first time this has occurred or has it happened previously?	
Any witnesses? If yes, please share their names.	
Is there any other physical evidence or documents of the incident? If yes, please attach the document or evidence	
Anything else that you would want to mention?	

The Complainant is required to provide all supporting documents and the names and addresses of witnesses, if any, with the complaint.

(Name and signature of the Complainant/ Aggrieved Woman)