

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

OBJECTIVE:

Marathon recognizes the right of every woman to a safe and secure workplace environment irrespective of her age or employment / work status. Hence this policy provides a work environment free from sexual harassment for all its employees as per the guidelines of "The sexual harassment of Women at workplace (prevention, prohibition & redressal) Act, 2013".

SCOPE:

The company aims to adopt zero tolerance attitudes against any kind of sexual harassment by any employee during their working tenure in Marathon Group towards any other person being an employee of the company, client, vendor and contractor at the workplace. The workplace includes: All offices/ sites or other premises where company's business is conducted. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

APPLICABILITY:

The policy applies to all categories of employees of the company including permanent, temporary staff, trainees and contract employees.

DEFINITIONS:

1. SEXUAL HARASSMENT:

Sexual Harassment may be one or a series of unwelcome sexual advances, requests for sexual favors, and other verbal / non-verbal or physical conduct of a sexual nature, regardless of whether committed by supervisory or non-supervisory personnel, classifies as sexual harassment when:

Submission to such conduct is expressed either explicitly or implicitly as a term or condition of an individual's employment.

Submission or rejection of such conduct by an individual is used as the basis for employment decisions, such as assigned duties, promotion, transfer, or termination.

Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment

Unwelcome sexually determined behavior (whether directly or by implication) includes, but is not limited to:

Physical contact, offensive or unwelcome sexual flirtations, advances, propositions

A demand or a request for sexual favors

Sexually colored remarks/ continual or repeated verbal abuse of a sexual nature

Graphic verbal commentaries about an individual's body / sexually degrading words used to describe an individual.

Showing pornography / electronic display or transmission of sexually suggestive material through email, mobile or any other media / channel.

The display in the workplace or at a work-related function of sexually suggestive objects or pictures.

Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

2. AGGRIEVED WOMAN:

In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

3. RESPONDENT:

Employee against whom the complaint of Sexual Harassment has been filed.

4. EMPLOYEE OF MARATHON GROUP:

Includes person carrying out any work on behalf of Marathon Group and may have been hired as permanent, Temporary, Contracted or on part time basis either directly or indirectly or through Vendor organization.

INTERNAL COMMITTEE (IC):

The company has instituted an internal committee (IC) for redress of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaint. The IC is formed accordance to "The sexual harassment of Women at workplace (prevention, prohibition & redressal) Act, 2013".

List of IC members is attached as Annexure...

IC is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment

Procedure to register complaint, resolution, settlement or prosecution of Sexual Harassment Act

A) Informal Resolution Option

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the IC for redressal of their grievances. The IC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B) Complaint to IC

An employee subjected to sexual harassment and not satisfied with informal resolution can report the case addressing to the Presiding Officer of IC within **90 days** of the occurrence of an incident of sexually oriented behavior.

To Report an incident or complaint, employee can send written or printed hard copies to Presiding officer or via e-mail to icc@marathonrealty.com or support portal at <http://support.marathonrealty.com/>, containing description of incident and other details such as Date, Timing, Respondent/s name and working relationship of involved parties.

All complaints will be investigated promptly. The Company has an obligation to investigate a credible claim of sexual harassment that is brought to its attention, with the aim of protecting not only the member filing the complaint, but also other members who might later be subjected to sexual harassment by the same offender.

The Presiding Officer of the IC shall, within **1 week** of the receipt of a complaint, convene the committee to investigate the complaint. Provided that where the complaint is against any "specified individual", where "specified individual" refers to any of the members of the committee or their relatives, the committee shall convene without the presence of that member on the committee.

IC shall conduct investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairman, Managing Director & Head HR as soon as possible and in any case, not later than 90 days from the date of the receipt of the complaint.

The Chairman, Managing Director & Head HR will ensure corrective action on the IC and keep the complainant informed of the same.

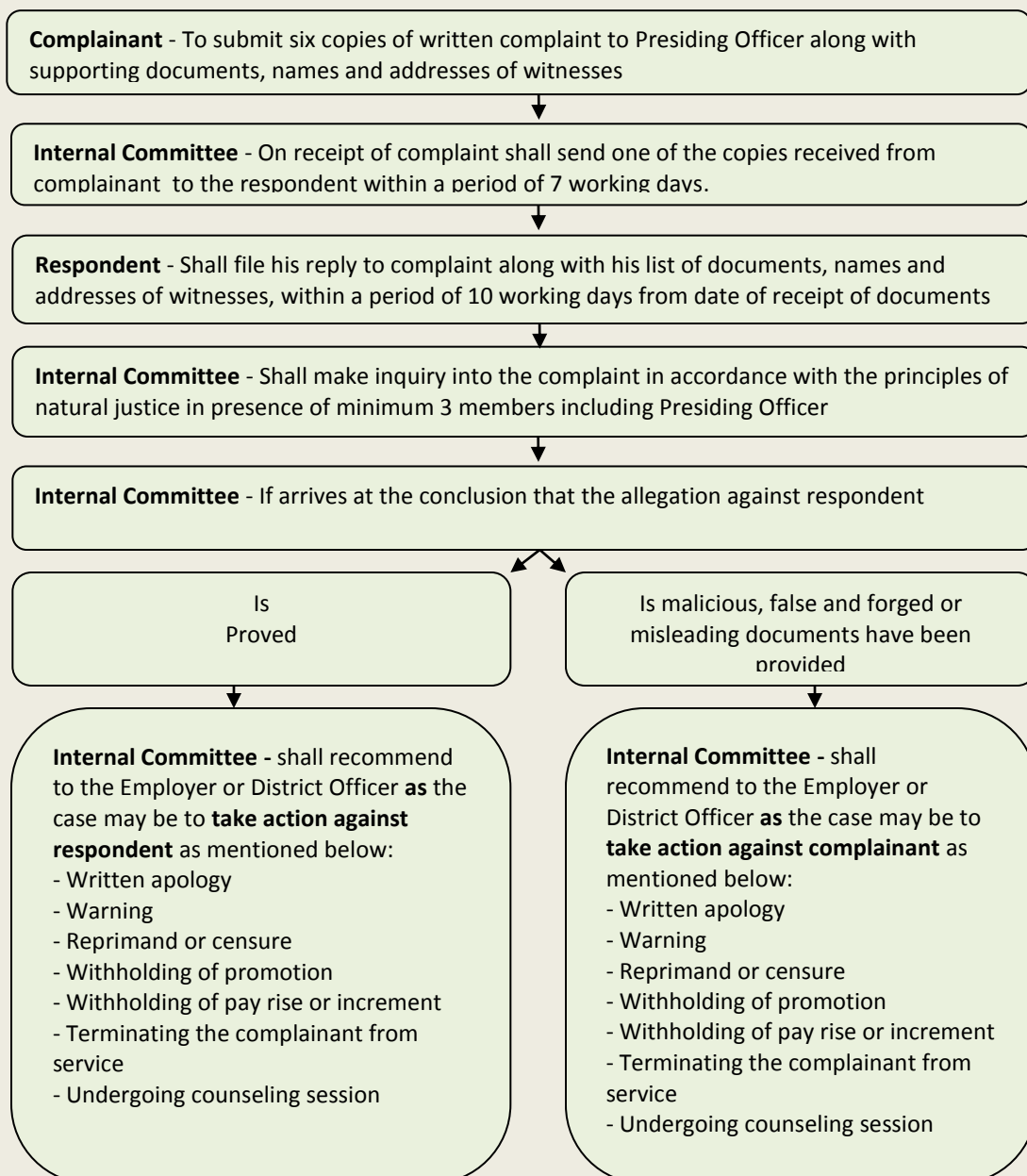
Corrective action may include any of the following:

- a. Formal Apology
- b. Counseling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file
- d. Change of work assignment/ transfer for either the perpetrator or the victim
- e. Suspension or termination of services of the employee found guilty of the offence

In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

While this obligation may make it impossible to maintain absolute confidentiality under all circumstances, the Company will attempt to treat such investigations as confidentially as is feasible under the circumstances.

Process flow for filing complaint and actions to be taken



IC Members List

Sr. No.	Name	Designation	Location
1	Ms. Rohini Basangar	Presiding Officer	Corporate
2	Mr. Keshav Korgaonkar	Member - External	External
3	Mr. Urvesh Mehta	Member - Internal	Corporate
4	Ms. Jyoti Mone	Member - Internal	Corporate
5	Mr. Satish Khengre	Member - Internal	Corporate
6	Mr. Rajeev Sivanandan	Member - Internal	Corporate
7	Ms. Ashwini Gavali	Member - Internal	Corporate
8	Ms. Anamika Pathak Mishra	Member - Internal	Corporate
9	Ms. Tejal Punjabi	Member - Internal	Monte Vista Mulund
10	Mr. Jitendra Bhaurao Deshmukh	Member - Internal	Emaze Mulund
11	Ms. Geeta Rajbir Punder	Member - Internal	Nexzone Panvel
12	Mr. Nitin Nivrutti Panaskar	Member - Internal	Nexzone Panvel
13	Ms. Rubaina Nazir Herekar	Member - Internal	Monte South Byculla
14	Mr. Murtuza Nuruddin Zaranwala	Member - Internal	Monte South Byculla
15	Ms. Salma Khwaja Sayed	Member - Internal	Nagari Badlapur
16	Mr. Kishor Patil	Member - Internal	Nextown Dombivali

Any changes in the above policy will be at the sole discretion of Management. The policy is created for enhancing good work culture for the employees. Any undue advantage taken by this policy by any employee will be reflecting on individuals work ethics and he/she can be terminated by the misuse of the same.