

**Magma General Insurance
Limited (Erstwhile Magma HDI
General Insurance Company
Limited)**

This document intends to prevent/prohibit, redress any incident of sexual harassment and to enforce strong disciplinary action in event of any such occurrence.

**Policy on Prevention, Prohibition and
Redressal of Sexual Harassment**

Effective Date:	21.07.2025
Approval Date:	21.07.2025
Version No.:	9.0
Approved By:	Board of Directors
Policy Owner:	Human Resource Department

This document is confidential in nature and shall supersede all policies on Prevention, Prohibition and Redressal of Sexual Harassment of the Company and should be read in conjunction with the most recent policies and procedures documented.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Base Document	:	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
Initial Document Prepared by	:	Human Resource Department
Functional aspects checked by	:	Mr. Debapratim Guha
Governing Guideline/Policy	:	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
Legal aspects checked by	:	Mr. Anand Roop Choudhary, Mr. Vishal Jain, Ms. Arti Choudhary and Mr. Karan Purohit

Policy on Prevention, Prohibition and Redressal of Sexual Harassment
Magma General Insurance Limited (Erstwhile Magma HDI General Insurance Company Limited)

Sr.	Contents	Page no.
1	Purpose & Scope	3
2	Objectives	3
3	Applicability	3
4	Definition	3
	(i) Sexual Harassment	3
	(ii) Certain other Factors to define Sexual Harassment	4
	(iii) Workplace	4
	(iv) Employee.....	4
	(v) Aggrieved Person.....	4
	(vi) Respondent.....	4
	(vii) Bystander.....	4
5	Role of Bystander/Aggrieved Person	5
6	Internal Committee.....	6
	A. Content of Complaint.....	6
	B. Interim Relief.....	6
	C. Conciliation.....	7
	D. Formal Complaint Resolution Procedure.....	7
	E. Recusal from inquiry	9
	F. Annual Report	9
7	Appeals	9
8	Third Party Harassment.....	9
9	Savings.....	9
10	Criminal Proceedings / Other Remedies.....	10
11	Duties of the Company	10
12	Complainants or witnesses.....	10
13	Confidentiality.....	11
14	Annual Meeting of the Committee.....	11
15	Responsibility for implementation.....	11
16	Amendments/Modifications.....	11

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

17	Change Control Board.....	12
	Annexures.....	13

1. Purpose & Scope

Magma General Insurance Limited (Erstwhile Magma HDI General Insurance Company Limited) (herein referred to as the ‘**Company**’) is committed to provide to all employees a work-environment conducive to professional growth with equal opportunity to all. For the same, it is important to promote a work environment free from sexual harassment and one which promotes dignity, respect and fair treatment.

In pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder [herein after referred to as “**POSH Laws**”], the Company has framed this Policy on Prevention, Prohibition and Redressal of Sexual Harassment at workplace (herein referred to as the ‘**Policy**’). The purpose of this Policy is to lay down the Company’s approach to deal with incidences of Sexual Harassment at Workplace and to ensure that any incidence of Sexual Harassment is dealt with appropriately, sensitively and expeditiously in line with the guidelines as prescribed under the POSH Laws and the Policy.

Any form of Sexual Harassment whether overt or covert; intentional or unintended is unacceptable and therefore is prohibited and regarded as misconduct in terms of this Policy.

It is the responsibility of all those connected with the Company to comply with the Policy.

2. Objectives

Provide a framework enabling creation of:

- Work environment free from fear, reprisal, coercion, discrimination and harassment of sexual nature.
- Expressing zero tolerance to any Sexual Harassment at Workplace through prevention, prohibition, redressal and deterrence of acts of Sexual Harassment.

3. Applicability

This Policy applies mutatis mutandis to all individuals who are employed in the Company, either engaged in permanent, contractual or temporary capacity (in any office which includes regional / branch / on-site/off-site etc.) in the Company. As per the POSH Laws, the Policy also applies mutatis mutandis to the vendors, visitors or any other associates of the Company.

4. Definitions

(i) Sexual Harassment:

“**Sexual Harassment**” includes any one or more of the following unwelcome acts or behavior

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

(whether directly or by implication) namely:—

- (a) physical contact and advances; or
- (b) a demand or request for sexual favours; or
- (c) making sexually coloured remarks; or
- (d) showing pornography; or
- (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

(ii) Certain other Factors to define Sexual Harassment:

The following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment : –

- (a) Implied or explicit promise of preferential treatment in their employment, or
- (b) Implied or explicit threat of detrimental treatment in their employment, or
- (c) Implied or explicit threat about their present or future employment or
- (d) Humiliating treatment likely to affect their health or safety or
- (e) Interference with the person's work or creating an intimidating or offensive or hostile work environment for the person or

(iii) Workplace: Workplace includes:

- (a) any office, branch or unit, which is established, owned or controlled by the Company;
- (b) any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey;

(iv) Employee: “Employee” means a person employed at the Company for any work on permanent/regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

(v) Aggrieved Person: “Aggrieved Person” means in relation to a workplace, a person, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent. Herein after also denoted as the **Complainant**;

(vi) Respondent: “Respondent” means a **person** against whom the Aggrieved Person has made a written complaint.;

(vii) Bystander: “Bystander” means any person who observes Sexual Harassment taking place at the workplace and is not the aggrieved person.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

5. Role of Bystander/Aggrieved Person/FIFs

- (a) In the first instance, when a Bystander/ Aggrieved Person observes behaviour of Sexual Harassment, the Bystander/ Aggrieved Person should confront the alleged harasser and bring it to their attention that the behaviour is unwelcome and firmly request it be stopped.
- (b) The Aggrieved Person should bring it to the attention of Internal Committee.
- (c) The Company shall nominate officers in different zones as First Instance Facilitator (FIFs) [Reference to **Annexure – 1**] in compliance with the POSH Laws, to provide first instance facilitation in case of any complaint of Sexual Harassment. FIFs shall also co-ordinate preventive activities to create a Sexual Harassment free atmosphere in the Company and will be available to hear and deal with any concerns the Employees/ Aggrieved Person may have and inform them about this Policy and the complaint process. FIFs will bring any information relating to Sexual Harassment incident to the notice of Internal Committee for next appropriate steps.
- (d) If the Bystander/ Aggrieved Person needs any support or clarification they may reach out to the FIF in their respective Zone.
- (e) An Aggrieved Person may make, in writing, a complaint of Sexual Harassment at Workplace to the Internal Committee (as defined hereunder) within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident or any such period as may be provided by the POSH Laws from time to time.
- (f) The complaint shall be addressed to the Member(s) of the Internal Committee and sent to posh.icc@magmainurance.com
- (g) The Internal Committee may, for the reasons to be recorded in writing, extend the time limit for reporting the complaint by such periods as it deems fit not exceeding three months or as may be provided by the POSH Laws from time to time, if it is satisfied that the circumstances were such which prevented the Aggrieved Person from filing a complaint within the actual time period.
- (h) Where such complaint cannot be made in writing, the presiding officer of the Internal Committee or any member of the Internal Committee as the case may be, shall render all reasonable assistance to the Aggrieved Person for making the complaint in writing.
- (i) Where the Aggrieved Person is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, their legal heir or any other person as per the provisions of POSH Laws may make a complaint in writing to the Internal Committee.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

6. Internal Committee

The Company shall constitute an Internal Committee [“IC”] for the purpose of conducting inquiry in the matter of Sexual Harassment.

Since the Workplace are located at different locations, there will be a central Internal Committee which will look into complaints from all the locations. The minimum composition of the Internal Committee shall be as given below:

- (i) Presiding officer who shall be a woman employed at a senior level at the Workplace from amongst the employees;
- (ii) Not less than two members from amongst employees preferably committed to the cause or who have had experience in social work or have legal knowledge;
- (iii) One member from amongst non-governmental organisations or associations committed to the cause or a person familiar with the issues relating to sexual harassment:

Provided that at least one-half of the total members so nominated shall be women. The tenure of the presiding officer/members shall not exceed three years or such other tenure as may be prescribed by the POSH Laws from time to time.

Please refer to **Annexure-2** for the details of the presiding officer / members of the Internal Committee. The information regarding IC members and their details will be made available on the website of the Company along with the procedure of filing complaint.

A. Content of Complaint:

The complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name(s) of Complainant, Respondent, designation, location of the incidence(s) and Respondent, date(s) of incidence(s), time, witnesses if any, etc.

For the sake of convenience, the Complaint Form is annexed as “**Annexure -3**”. The Complainant shall submit six copies of the Complaint along with supporting documents and the names and addresses of the witnesses to the IC.

B. Interim Relief:

During the pendency of the inquiry, on a written request, if made by the Complainant, the IC may recommend to the Company as to: -

- (i) Transfer the Complainant or the Respondent to any other Workplace.
- (ii) Granting of leave(s) as appropriate, up to a period of three months (as may be prescribed by the POSH Laws from time to time) in addition to the leave that the Complainant would be otherwise entitled to.
- (iii) Restrain the Respondent from assessing/reporting on Complainant’ work performance and accordingly change in reporting hierarchy if the Complainant is directly reporting to the Respondent.
- (iv) Or grant such other relief to the Complainant as may be prescribed by the POSH Laws.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

C. Conciliation

- (i) Before initiating an inquiry under this Policy, the Internal Committee may, at the written request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation. The Internal Committee will attempt to resolve the raised issue through mutual discussion between the Complainant and the Respondent. The conciliation process will also be documented and shall be the part of the records.
- (ii) The Internal Committee will record the terms of settlement acceptable to the Complainant and the Respondent and file a closure report with the CHRO/ HR department to take further action as recorded in the settlement. Copies of the settlement shall be provided to the Complainant and the Respondent. All persons involved in the conciliation will maintain the dignity and confidentiality of the persons involved. The Complainant will have the right to withdraw from the conciliation process by stating the reasons for withdrawal in writing to the Internal Committee.
- (iii) No monetary settlement shall be made as a basis of conciliation.
- (iv) Post the conciliation process, after the settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.
- (v) Where the Complainant informs the IC that any of the terms or conditions mentioned in the conciliation settlement are not complied with by the Respondent, then the Internal Committee shall take appropriate next steps.

D. Formal Complaint Resolution Procedure:

- i. The Internal Committee, while maintaining strict confidentiality, shall, where the Respondent is an employee take immediate necessary action to hold an inquiry in accordance with the provisions of service rules applicable. The Respondent shall be provided a copy of the complaint within 7 (seven) working days from receipt of the complaint. The Respondent shall file his / her reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of the complaint.
- ii. The Complainant shall be provided with a copy of the Respondent's reply. The Internal Committee may also take inputs from the witnesses named by the parties and any other persons whosoever deemed appropriate.
- iii. The IC shall make inquiry into the Complaint in accordance with the principles of natural justice.
- iv. The IC may terminate the inquiry proceedings or give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves for three consecutive hearings convened by the IC. However, such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

- v. The Complainant or Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- vi. In conducting the inquiry, a minimum of three members of the IC including the Presiding Officer, shall be present.
- vii. Members of the IC shall after examination of the complaint and the response of the Respondent, and all evidence placed before it, including witness statements conclude the inquiry. Where both the parties are employees, the parties 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 parties enabling them to make representation against the findings before the Internal Committee. On the completion of the inquiry, the IC shall provide a report of its findings to the Company within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties. The inquiry shall be completed within a period of ninety days. The Internal Committee shall keep complete documentation of the complaint, inquiry and its report. The IC / officer designated for this purpose, or the Presiding Officer shall ensure that all documents shall be kept securely.
- viii. Where the Internal Committee arrives at a conclusion that the allegation against the Respondent has been proved, it shall recommend to the Company to take necessary action as appropriate as per the provisions of the applicable service rules and POSH Law. The Company shall act upon the recommendation within sixty days of its receipt.
- ix. Where the Internal Committee arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company in the report as to no action is required to be taken in this matter.
- x. Where the Internal Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant or witness has given any false evidence or produced any forged or misleading document it may recommend to the Company to take necessary action as appropriate as per the provisions of the applicable service rules and POSH Laws. However, mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.
Further that the malicious intent on part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.
- xi. Timelines and detailed processes are articulated in **Annexure -4**.

E. Recusal from inquiry:

IC member shall inform the IC committee for any potential conflict of interest while conducting the inquiry. The IC member shall be excused to be part of inquiry wherever there

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

is any conflict of interest. The management is authorized to appoint any member in the IC on *ad hoc* basis.

F. Annual Report:

The Internal Committee shall prepare and submit an annual report to the Company in each calendar year.

7. Appeals

Any person aggrieved from the recommendations of the IC or non-implementation of such recommendations may, within ninety days of the recommendations, prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person.

8. Third Party Harassment

Where Sexual Harassment occurs as a result of an act or omission by any third party or outsider, who is not directly on the pay-rolls of the Company, it shall be out of the jurisdiction of the IC. However, the Company and the persons in charge, upon reporting of the case, may take all steps, necessary and reasonable to assist the aggrieved person in terms of support and preventive action.

9. Savings

- Nothing contained in this Policy shall prejudice any right available to the aggrieved person, Complainant, Respondent, Company, IC or prevent any person from seeking any legal remedy under any law for the time being in force.
- In case of any discrepancy in the Policy, the provisions of relevant POSH Laws shall prevail.
- The Company reserves the right to modify and, or review the provisions of this Policy, so as to meet the requirement of the provisions of any applicable law.
- This Policy is drafted in compliance of the present POSH Laws and therefore all the implied procedure, provisions [present or if amended from time to time] shall be followed & applicable mutatis mutandis. Also, the mentioned timelines, limitations etc. in the Policy shall be deemed to be replaced & updated with the new enactment(s), amendment(s), legal provision(s), ruling(s) & likewise as and when pronounced and effective.
- IC shall have all powers as provided under the POSH Laws and shall discharge their duties & dispose the complaints accordingly.
- If any provision of the Policy is held to be illegal or invalid or amended for any reason, the illegality or invalidity shall not affect the remaining provisions hereof, but such provision shall be fully severable, and the Policy shall be construed and enforced as if the illegal or invalid provision had never been included herein.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

10. Criminal Proceedings / Other Remedies

Where any conduct of the Respondent amounts to a specific offence under the Bharatiya Nyaya Sanhita, 2023 or under any other law, the Company may also initiate appropriate action in accordance with law by making a complaint with the appropriate authority. The aggrieved person who are victims of Sexual Harassment may, in addition to lodging complaint with the Internal Committee, also seek legal remedies as may be available under the various laws for the time being in force

11. Duties of the Company

The Company shall in accordance with the POSH Laws:

- Provide a safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace;
- Display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassments; and the order constituting, the Internal Committee;
- Organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the POSH Laws and orientation programmes for the members of the Internal Committee.
- Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting inquiries;
- Assist in securing the attendance of Respondent and witnesses before the Internal Committee.
- Make available such information to the Internal Committee, as it may require having regard to a complaint made under the provisions of this Policy and POSH Laws
- Provide assistance to the Aggrieved Person if they choose to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force;
- Cause to initiate action, under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force, against the perpetrator, or if the Aggrieved Person so desires, where the perpetrator is not an employee, in the Workplace at which the incident of Sexual Harassment took place;
- Treat Sexual Harassment as a misconduct under the service rules and initiate action for such misconduct;
- Monitor the timely submission of reports by the Internal Committee.
- Include the number of cases filed, if any, and their disposal under this Policy and POSH Laws in the annual report of the Company.

12. Complainant(s) or witnesses

The Complainant(s) or witnesses shall not be victimized or discriminated against, while dealing with complaints of Sexual Harassment or thereafter. This Policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or complaint of sexual harassment. Retaliation against persons who report or provide information about Sexual Harassment or behaviour that might constitute Sexual Harassment is also strictly prohibited.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

13. Confidentiality

The Company understands that it is difficult for the aggrieved person to come forward with a complaint of Sexual Harassment and recognizes their interest in keeping the matter confidential. Therefore, to protect the interest of the Complainant who reports incidents of Sexual Harassment, and the Respondent, who has been accused of Sexual Harassment, confidentiality shall be maintained throughout any inquiry process to the extent practicable and appropriate under the circumstances. Any person contravening the confidentiality clause shall be liable for penalty in accordance with the provisions of the service rules and the POSH Laws.

14. Annual Meeting of the Committee

The Committee shall meet at least once every financial year and review the efficacy of the implementation of the policy.

15. Responsibility for implementation

It will be the responsibility of Chief Human Resources Officer (CHRO) to ensure the implementation of the Policy in the Company.

16. Amendments/Modifications

Except the Annexures, the Policy shall be reviewed by the Board of Directors periodically as and when required and any changes made in the Policy shall be recorded in the change control record sheet attached with the Policy. All amendment, update in the Annexures of the Policy, are subject to CHRO's approval.

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

17. Change Control Record

Version No.	Change Request by	Memorandum of Change	Approval Date
2.0	Mr. Anand Roop Choudhary	To align with the requirement of constitution of the Internal Complaint Committee as per the POSH Act.	30.10.2015
3.0	Mr. Anand Roop Choudhary	Policy has been revised to make it Magma specific	28.07.2017
4.0	Mr. Anand Roop Choudhary	Policy has been revised to make it Magma specific	21.01.2021
5.0	Mr. Debapratim Guha	Policy has been changed to a gender neutral policy and further refinement of Policy	
	Mr. Debapratim Guha	No Change	28.07.2022
	Mr. Debapratim Guha	No Change	26.06.2023
6.0	Mr. Karan Purohit	General amendments	01.11.2023
7.0	Mr. Karan Purohit	Statutory compliances and addition of complaint form	30.04.2024
8.0	Ms. Ekta Kedia	Change in the email id and updation of list of IC members and FIFs	23.01.2025
9.0	Ms. Swarnima Agarwal	Changes made in alignment with the POSH Act and Rules, apart from other cosmetic and language modification.	21.07.2025

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Annexures

Annexure - 1

Policy on Prevention, Prohibition and Redressal of Sexual Harassment

List of First Instance Facilitators (FIFs)

Sr. No	Zone	First Instance Facilitator	Email ID	Phone No
1	North	Gaurav Kumar	gaurav.kumar@magmainsurance.com	8383000734
2	North	Megha Handa	megha.handa@magmainsurance.com	8377002745
3	East	Neha Ojha	neha.ojha@magmainsurance.com	9330158842
4	West	Chintan Ashokkumar Desai	chintan.desai@magmainsurance.com	9601267223
5	West	Hardik Vinayak Golatkar	hardik.golatkar@magmainsurance.com	8850138078
6	Central	Neeraj Shrivastava	neeraj.shrivastava@magmainsurance.com	7770909034
7	South	Ganesh Ram Jagannathan	ganesh.ram@magmainsurance.com	9849336977
8	Corporate-HO	Miti Kevyn Kadakia	miti.kadakia@magmainsurance.com	9819631532
9	West-Nahur	Nandakishore S	nandakishore.s@magmainsurance.com	9495682340

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Annexure- 2

Policy on Prevention, Prohibition and Redressal of Sexual Harassment

Complaints can be addressed to the Member(s) of the Internal Committee or sent to
posh.icc@magmaininsurance.com

Sl No.	Name	Authority	Email ID	Phone Number
1	Ekta Kedia	Presiding Officer of ICC (Chairperson)	ekta.kedia@magmaininsurance.com	9987579846
2	Balpreet Kaur	Member	balpreet.kaur@magmaininsurance.com	9619973760
3	Soumen Boyal	Member	soumen.boyal@magmaininsurance.com	7506507601
4	Reema Hemant Patankar	Member	reema.patankar@magmaininsurance.com	9833112372
5	Swarnima Agarwal	Member	swarnima.agrawal@magmaininsurance.com	9004003790
6	Vijaya Akhil Mehra	Member	vijaya.mehra@magmaininsurance.com	9820127603
7	Soma Gambhir	Member	soma.gambhir@magmaininsurance.com	9699059596
8	Kush Khurana	Member	kush.khurana@magmaininsurance.com	9611134892
9	Anirudh Devraj*	Member	anirudh.devraj@magmaininsurance.com	9717766290
10	Arti Chaudhry	External Member	arti_chaudhry@artichaudhry.com	9810318252

*w.e.f 12th January 2026

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Magma General Insurance Limited

Annexure 3

Complaint Form / शिकायत फॉर्म

The Principal Officer

(प्रधान अधिकारी)

Internal Committee

(आंतरिक समिति)

Magma General Insurance Limited

(मैग्मा जनरल इश्योरेंस लिमिटेड)

Subject: Filing of sexual harassment complaint / विषय: यौन उत्पीड़न की शिकायत दर्ज करना

[Mark "NA", if not applicable] / [यदि लागू न हो तो "एनए" अंकित करें]

Details of complainant / शिकायतकर्ता का विवरण:

- Name / नाम: _____
- Department / विभाग: _____
- Place of posting / पोस्टिंग का स्थान: _____
- Employee Code / कर्मचारी कोड: _____
- Contact details / सम्पर्क करने का विवरण: _____
- Email ID / ईमेल आईडी: _____
- Permanent Address / स्थायी पता: _____

Accused / Respondent details / अभियुक्त/प्रतिवादी का विवरण:

- Name / नाम: _____
- Department / विभाग: _____

Date of last incident / अंतिम घटना की तारीख: _____

Place of last incident / अंतिम घटना का स्थान: _____

* Document is in the ownership of the Company

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Magma General Insurance Limited

Please provide detail of incident(s) along with all dates

(कृपया सभी तिथियों सहित घटना(घटनाओं) का विवरण प्रदान करें)

Did you report this incident earlier.

(क्या आपने पहले इस घटना की रिपोर्ट की थी?)

Were there any witnesses [if yes, please share details like name, place of posting, working capacity etc.].

(क्या कोई गवाह था[यदि हां, तो कृपया नाम, तैनाती का स्थान, कार्य क्षमता आदि जैसे विवरण साझा करें])

*Document is in the ownership of the Company

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Magma General Insurance Limited

Is there any specific evidence available that supports your complaint, kindly share details:

(क्या कोई विशिष्ट साक्ष्य उपलब्ध है जो आपकी शिकायत का समर्थन करता हो, कृपया विवरण साझा करें)

Any other details, if you would like to share.

(कोई अन्य विवरण, यदि आप साझा करना चाहें।)

The aforementioned information provided is true and correct to the best of my knowledge & belief and I have also gone through with the Policy established in this behalf by the Company and ready to cooperate with the inquiry & procedure of investigation.

(प्रदान की गई उपरोक्त जानकारी मेरी सर्वोत्तम जानकारी और विश्वास के अनुसार सत्य और सही है और मैं कंपनी द्वारा इस संबंध में स्थापित नीति का भी पालन कर चुका हूँ और जांच और जांच की प्रक्रिया में सहयोग करने के लिए तैयार हूँ।)

[Signature / हस्ताक्षर] _____

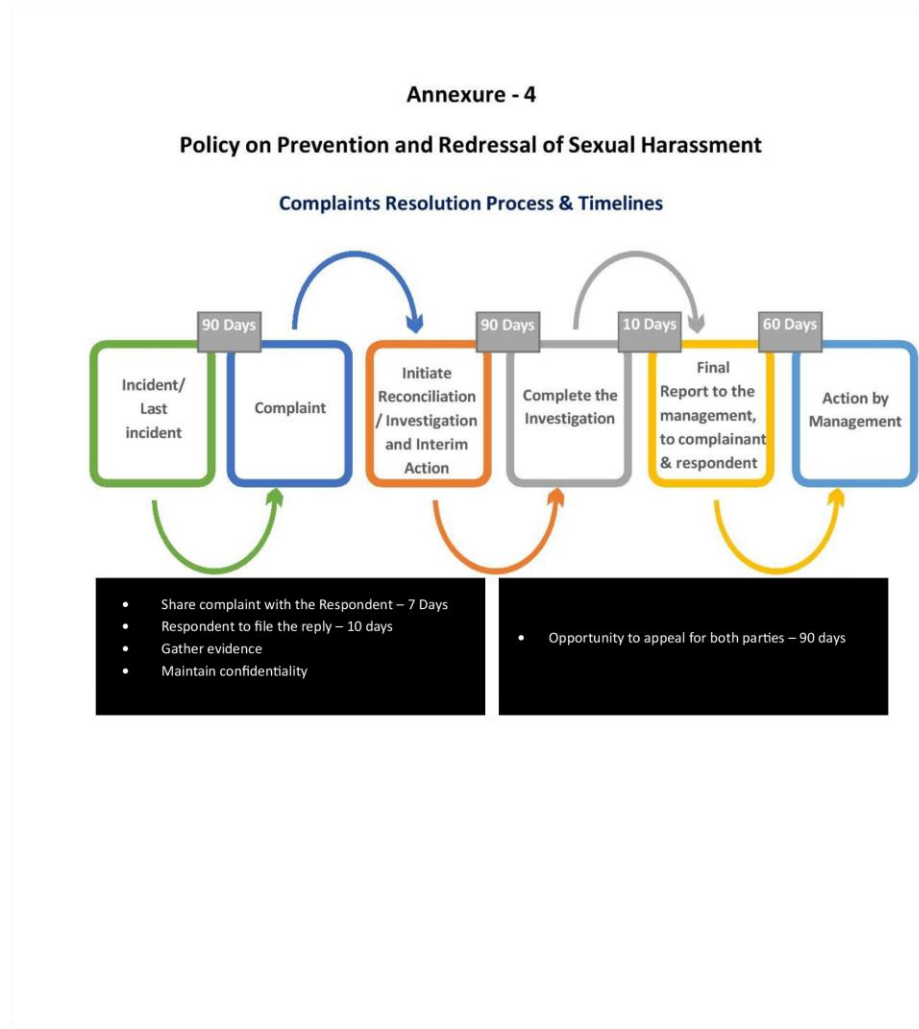
[Name / नाम] _____

[Date / तारीख] _____

*Document is in the ownership of the Company

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0

Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0



Subject:	Original Issue Date: 31.10.2014	Effective Date: 21.07.2025
Policy on Prevention, Prohibition and Redressal of Sexual Harassment	Revision Dates: 31.10.2014, 30.10.2015, 28.07.2017, 21.01.2021, 22.07.2021, 01.11.2023, 30.04.2024, 23.01.2025, 21.07.2025	Version No: 9.0
