

ANTI-DISCRIMINATION AND HARASSMENT POLICY

MITS Global Consulting Pvt. Ltd.

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Version History

VERSION	DATE	PREPARED BY	REVIEWED BY	APPROVED BY
1.0	03.09.2024	Sangeeta Mungapatil	Aakash Dhurka	Sandeep Dhurka
1.1	06.01.2025	Sangeeta Mungapatil	Aakash Dhurka	Sandeep Dhurka
1.2	13.08.2026	Sangeeta Mungapatil	Aakash Dhurka	Sandeep Dhurka

Policy Statement

MITS Global Consulting Pvt. Ltd. is committed to providing a workplace where all individuals are treated with dignity, fairness and respect. Discrimination, harassment, bullying, intimidation, retaliation or other abusive behaviour will not be tolerated.

Scope

This policy applies to employees, interns, contractors, consultants and other persons working with or interacting with MITS.

It applies to:

Office and client-related work environments;	Remote work and virtual communication;	Recruitment and hiring;
Training, promotion and career development;	Workplace events and business travel; and	Other work-related interactions.

Commitments

MITS is committed to:

Equal Opportunity

Providing equal opportunity and fair treatment in employment and recruitment decisions.

Awareness & Training

Providing periodic awareness on respectful and inclusive workplace behaviour.

Protection from Retaliation

Protecting individuals who raise concerns in good faith from retaliation.



Prevention

Preventing discrimination, harassment, bullying and abusive behaviour.

Merit-Based Decisions

Making employment decisions based on relevant skills, qualifications and performance.

Confidential Reporting

Maintaining confidential reporting and fair investigation mechanisms.

Objectives and Targets

The objective of this policy is to promote a respectful and inclusive workplace by preventing discrimination and harassment, supporting fair employment practices, and ensuring that individuals have appropriate channels to raise and address workplace concerns.

MITS will:

- 1 Conduct at least one discrimination and harassment prevention awareness session annually for relevant employees.
- 2 Provide fair-hiring / non-discrimination awareness to HR and recruitment personnel annually.
- 3 Review job descriptions using the MITS fairness and non-discrimination checklist for applicable new or materially revised roles.
- 4 Maintain a record of discrimination and harassment complaints and review reported cases and actions annually.

Reporting and Investigation

Employees may raise concerns through:



HR;



their manager or skip-level manager;



available grievance channels; or



the MITS Whistleblower Mechanism, where appropriate.

Complaints will be handled as confidentially as reasonably possible and reviewed in a fair and timely manner. Appropriate corrective or disciplinary action may be taken where a violation is established.

Roles and Responsibilities

HR Team and Management

The HR Team and Management are responsible for implementing this policy, supporting fair investigations, maintaining relevant records and communicating expected workplace behaviour.

Managers

Managers are expected to promote respectful and non-discriminatory behaviour within their teams.

Employees

Employees are expected to treat colleagues and stakeholders fairly and respectfully.

Records and Documentation

Relevant records may include:

Training and awareness records	Recruitment fairness checklists	Screening and interview records
Complaint and investigation records	Corrective action records	Employee communication records

Related Policies

This policy should be read together with:

Labour and Human Rights Policy	DEI Policy
POSH Policy	Whistleblower Policy
Employee Code of Conduct	Employee Handbook

Policy Review and Refresh

This policy will be reviewed annually to confirm its continued relevance, effectiveness and alignment with applicable legal, regulatory, organisational and workplace requirements. A comprehensive review and refresh of the policy will be undertaken at least once every two years. The policy will also be reviewed and updated earlier where significant changes occur in applicable laws or regulations, workplace arrangements, discrimination or harassment risks, organisational requirements, or other circumstances relevant to this policy.

The outcome of the annual review will be documented. Any material amendments will be approved by authorised management and communicated to relevant stakeholders.

Revision Note



Version 1.2 – 13.08.2026: Expanded workforce coverage, clarified prohibited conduct, strengthened reporting and non-retaliation provisions and updated objectives.