



Human Rights Policy

Document Control

Document Name	Human Rights Policy
Document Status	Final
Current Version	3.0
Effective Date	01-12-2022
Owner Department & Administrator(s)	Human Resource

Revision History

Version No	Prepared by	Reviewed and Approved by	Last Release date
1	Amarpreet Kour Dutta	Gagan Deep Sharma	01-06-2020
2	Amarpreet Kour Dutta	Saachi Sachdev	15-09-2021
3	Amarpreet Kour Dutta	Saachi Sachdev	01-12-2022

Midland Microfin Limited is aware of the significant contribution business can make to the long-term protection of human rights. In accordance with the relevant laws, internationally recognized human rights standards, frameworks & its associated internal instruments regulations, the organization is dedicated to respecting the human rights of our stakeholders.

Our commitment includes upholding human rights, attempting to avoid situations where such rights are being violated, recognizing, assessing, and minimizing any negative effects through due diligence and problem management, and successfully addressing concerns from impacted stakeholders.

Midland Microfin Limited endeavors to achieve our commitment by:

- Ensuring continued good adherence to all relevant constitutional and regulatory human rights obligations.
- Engaging in an iterative process of due diligence with an emphasis on discovering, evaluating, and managing any risks and repercussions.
- Aligning our current rules, procedures, and operations with our dedication to upholding human rights.
- Increasing human rights knowledge among employees at all levels of our business through training and communication.
- Engaging with stakeholders in an inclusive, transparent, and culturally appropriate manner on human rights concerns related to our business activities.
- Honoring diversity, promoting equality of opportunity, cultivating goodwill, and generating long-term employment.
- Prohibiting all forms of harmful child labor, forced / trafficked labour, discrimination, and harassment.
- Prohibiting any contribution to armed conflict or human rights abuses
- Providing access to remedy by resolving grievances in a timely and culturally appropriate manner.
- Establishing clear accountability by assigning adequate resources and responsibilities for effective management of human rights risks.
- Continually improving human rights performance by sharing good practices and learnings, setting, and reviewing targets, and monitoring, reporting, and disclosing performance.

Core Principles

Equal Opportunity, Non-Discrimination, Diversity and Inclusion

Midland Microfin is dedicated to offering equal employment opportunities to all qualified parties without prejudice or discrimination based on age, sex, colour, caste, disability, marital status, ethnic origin, race, religion, sexual orientation, disease (such as HIV/Aids), or any other status of people unrelated to the person's capacity to perform work. By ensuring that every employee has an equal opportunity for career progression, the company is dedicated to meritocracy-based hiring practices. Any form of disability discrimination in employment-related matters is prohibited by the company.

Fair Treatment

Employees will be treated fairly and consistently. Employees will be provided with competitive remuneration and benefits and a conducive work environment in exchange for their efforts and contributions. We believe in equal pay for equal work and there will be no discrimination against employees on any grounds.

Prevention of Harassment

Midland provides a work environment free from all sorts of harassment, whether it be verbal, physical, or psychological. Sexual harassment, as well as any behaviour that can promote an uncomfortable or hostile work environment, including unwanted or uninvited sexual advances is strictly prohibited.

Abolition of Forced Labor

We are against any form of coerced or prison labor, use of physical punishment or threats of violence or other forms of physical, sexual, psychological, or verbal abuse as a method of discipline or control.

Safe & Healthful Workplace

Midland Microfin Limited is committed to providing a productive workplace by minimizing the risk of accidents, injury, and exposure to health risks. Midland's policy is to provide a safe and healthy workplace and comply with applicable laws and regulations.

Committee Members

Midland Microfin Limited has a dedicated team to receiving all the reports / complaints made under this policy. The team is comprised of three members and an HR representative which is headed by Whistle Blower Officer: – Mr. Amitesh Kumar – COO. This team will be responsible for receiving all complaints under this policy, maintaining confidentiality, and ensuring appropriate action within stipulated time as per the gravity of the case.

These complaints must be addressed to –

- **Mr. Amitesh Kumar – Whistle blower Officer**

Members

Name	Category	Contact no
Mr. Amitesh Kumar	Whistle Blower Officer	78372-18817, 98759-61515
Mr. Gagandeep Sharma	Member	78372-18818
Ms. Amarpreet Kour Dutta	Member	75270-31409
Ms. Komal Sharma	Member	18001379600 18001370600

In case of filing a written complaint, if the complainant wishes to choose anonymity, then they need not furnish any particulars that may identify him/her.

Acknowledgements

An acknowledgement shall be sent/given to the complainant within three working days of the receipt of the grievance.

In case the complaint received does not pertain to the intermediary, the complaint shall be transferred to the concerned intermediary within three working days. In case the complaint pertains to activity of more than one intermediary, then the complaint shall be transferred to each of such intermediary involved, provided however that resolution time shall not exceed 10 days from the date of the receipt of the complaint from the complainant.

Redressal Mechanism

We have established a robust Whistleblower Policy and mechanism at the company that is overseen by the committee members. Our Whistleblower Policy is available for all our stakeholders to report any suspected or actual occurrence of illegal, unethical, or inappropriate actions, including – but not limited to – human rights violation. Additionally, any grievances related to violations of human rights can be reported on

whistle.blower@midlandmicrofin.com,

cgru@midlandmicrofin.com,

Grievance.redressal@midlandmicrofin.com

HR Toll Free Number – 18001379600

HR-One Helpdesk Module

Letter through registered post

Redressal of Grievance and TAT

1. The complaint letter / email should contain the relevant details, Complainant's name, address and contact details, copies of supporting documents, wherever applicable.
2. All the complaints shall be registered in the MIS Tracker.
3. If the grievance is resolved within three working days, the resolution shall be communicated along with the acknowledgement to the complainant.
4. The complaint shall be addressed as early as possible and within a maximum of 10 days of receipt of the complaint.
5. All complaints shall be escalated to the next higher level of authority within the organization for cases which are pending for resolution for more than 5 days from the date of acknowledgement.
6. Cases which are escalated will be dealt with and monitored by the Grievance Redressal Officer of the Organization.
7. The GRO would monitor the resolution of complaints received by the Organization and periodically put up the same for review by Senior Management.
8. Complaint details will be kept confidential and shall be shared with other organizations / regulatory authorities only if in accordance with the relevant laws and the subscriber will be kept apprised about the same.

9. All complaints shall be monitored and marked as closed only after communicating the complaint.
10. The complaint shall be treated as closed if the complainant has not responded within 30 days of the receipt of the written response from the organization.

Responsibilities

The management in collaboration with other functions and committees will look at the implementation of this policy and their responsibilities will include but will not be limited to

1. Revision of the policy and the clauses within, as per the latest national and international guidelines on human rights and labor relations.
2. Incorporation of human rights considerations in business strategy and operations.
3. Providing adequate mechanisms for stakeholders to report their grievances.
4. Taking appropriate action against violators of the principles in this policy.

Communication

The Company will circulate the information about this policy document, from time to time, to the stakeholders.
