Anti-Harassment Policy

Objective

To describe the company's policy on harassment, including sexual harassment and the procedure for reporting any incident involving any type of harassment.

Scope

The scope of the policy extends to all employees of Aragen Life Sciences Limited and its subsidiaries, Aragen Biologics Pvt Limited and Intox Pvt Limited and external stakeholders.

General Policy

The Company is committed to maintain a work environment that is free of discrimination and harassment. In order to maintain such an environment in which individuals are treated with mutual respect and consideration, the Company prohibits all forms of harassment of employees, visitors and vendors.

Employee Conduct

- Employees are prohibited from engaging in any conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as sex, color, race, ancestry, national origin, age, disability, or other legally protected status. The Company will take serious view of any harassing conduct that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile, or offensive working environment.
- All employees are prohibited from engaging in any kind of sexual misconduct or overtures, whether verbal, physical or visual. Such prohibited misconduct includes, but is not limited to, offensive and unwelcome sexual advances; verbal abuse of a sexual nature; graphic or degrading sexual comments about an individual on their appearance; the display of sexually suggestive objects or pictures; or any offensive or abusive physical contact.

Reporting Procedure

- Any employee, who is a victim of the above said harassment, should immediately report the matter to the Anti-Harassment Committee (AHC). The person may report the matter by any of the following means:
    a) By writing to the email-id ahc@aragen.com , this mail will be automatically forwarded to all the AHC committee members.

b) By writing to any of the committee members individually (email-ids available on the last page of the policy)
c) By telephonically calling any of the committee members individually (telephone numbers available of the last page of the policy)

- **In case of any complaint against an AHC member, then the victim may directly write to the Chief Human Resource Officer (CHRO). The CHRO will constitute a special committee to conduct the investigation.**
- The Company forbids retaliation against anyone for reporting harassment, assisting in making a harassment complaint, or cooperating in a harassment investigation.

Investigation

- The AHC will promptly investigate complaints of harassment.
- The investigation will be conducted impartially, and the involved parties shall be given sufficient platform for explanation. AHC will protect, to the extent possible, the privacy and the interest of the parties concerned.
- If during the course of investigation, it is concluded that the harassment complaint was a malafide motive then the compliant become null and void and strict disciplinary action as deemed appropriate shall be taken against the complainant.
- The committee shall submit its report with recommendations to the CHRO in confidentiality.
- Appropriate Disciplinary action leading up to termination of services shall be taken based on the nature of the complaint/committee findings and the CHRO's decision based on the facts of the case shall be deemed to be final and abiding.

Victim Protection

- Victim Protection: Organization is committed to providing support and protection to victims of harassment, ensuring their safety and well-being. The identity of the victim as well as the details of complaint are kept confidential to the extent possible and ensures that they will not face discrimination or unfair treatment as a result of reporting the incident.
- Non- Retaliation: The organization strictly prohibits any form of retaliation against individuals who report harassment, participate in an investigation, or provide information related to a compliant
- Retaliation includes , but is not limited to, demotion, termination, harassment, discrimination, reduction in pay, or any adverse action affecting the individual's employment conditions.
- Reporting Retaliation: Employees who believe they have been subjected to retaliation should report the incident to the designated committee or CHRO of the organization immediately. All complaints of retaliation will be promptly investigated in accordance with organizations' procedures. Individuals found guilty of retaliation will face disciplinary actions, which may include termination of employment.

AHC Committee

- The AHC will explicitly have almost equal representation of Male and Female senior management level members.
- A quorum of 2 members is required to be present for the proceedings to take place. The quorum shall include at least one lady member, if the compliant is related to sexual harassment.
- The tenure of the AHC committee members will be for period of 2 years. Every 2 years, the CHRO shall nominate the AHC members.
- The AHC members to meet once in every quarter.
- The AHC members for the year 2023-2025.

Name	Designation	BU/Location	Email-id	Direct Line number
Krishna Ethiraj	Senior Vice President	Chemistry/ Mallapur	krishna.ethiraj@aragen.com	27175897
Pratima Srivastava	Vice President	Biology/ Mallapur	pratima.srivastava@aragen.com	67483490
Nagasai Viyyapu	Senior Director- HR	Corporate/ Mallapur	nagasai.viyyapu@aragen.com	69063898
Chandan Shirbhayye	Vice President	SCM/ Nacharam	chandan.shirbhayye@aragen.com	66281858

General

While this policy sets forth our goals for promoting a workplace that is free of any kind of harassment, the policy is not designed or intended to limit the authority of management/ supervisors/ managers to ensure discipline or take remedial action for workplace/ work related misconduct or unprofessionalism.

Power to amend

The management may at its discretion amend or withdraw any or all of the above provisions of this policy at any time with/without notice. The utility and the interpretation of the policy will be at the sole discretion of the management.

Policy Tracker

Original	1st Amendment	2nd Amendment	3rd Amendment
1st September 2007	17th February 2009 15th June 2010- Committee updated 1st April 2011- Committee updated 1st August 2011- Committee updated 1st May 2013- Committee updated 1st July 2017- Committee updated 7th August 2020- Committee updated	29th May 2018	16th June, 2021
4th Amendment	**5th Amendment**		
23rd July, 2024	10th Oct, 2024		