Policy on Sexual Harassment (Prevention, Prohibition & Redressal) at workplace

Objective

To describe the company's policy on prevention, prohibition & redressal of sexual harassment at workplace.

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.

Definitions under the policy

Sexual Harassment

- Sexual Harassment" includes unwelcome sexually determined behavior such as physical contact or advances, sexually coloured remarks, showing pornography and sexual demand, whether by verbal (words) or non-verbal (actions), either explicit or implicit.
- Any form of non-verbal - gestures, staring, invading personal space, offensive publications or letters or memos or messages, unsolicited and unwanted gifts.
- Any form of verbal - language of a suggestive or explicit nature, use of vulgar language, unwanted propositions, jokes of sexual or explicit nature, eve teasing, innuendo or taunts, use of affectionate names, gender based insults, questions or comments or inquires of a personal nature/ life, comments on appearances, clothing, body, character or behavior.
- The act or behavior may be any single communication, or a range of communication or using any technology.
- Any of the above conduct which is humiliating and may constitute a health and safety problem, which affects the individual and her performance.

Complainant (Aggrieved Women)

- Any aggrieved women (Complainant) employee, who alleges to have been subjected to any act of sexual harassment by the Respondent.

Respondent

- A person, against whom the aggrieved woman / complainant has made a complaint of sexual harassment.

Internal Complaints Committee (ICC)

- A committee at workplace for redressal of sexual harassment complaint. Member details

of the Internal Complaints Committee (ICC) as per the Annexure Table A

Management Committee

The Management Committee comprising of Head Human Resources & Head Legal of the Company who will act and implement on the recommendations of the ICC

Preventive Steps

Consistent with the existing law the company shall take all reasonable steps to ensure prevention of sexual harassment at work. Such steps shall include:

- Publish the policy on sexual harassment on intranet to all persons employed by or in any way acting in connection with the work and/or functioning of the company.
- An Internal Complaints Committee (ICC) at workplace to consider and redress complaints on Sexual Harassment.
- Names and contact numbers of the members of the Internal Complaints Committee (ICC) will be prominently displayed in all the offices and is mentioned in the Annexure Table A.
- Conduct training on sexual harassment to employees and ICC.
- Any & all complaints or allegations of sexual harassment will be investigated promptly. Appropriate corrective action will be implemented based upon the recommendations of the Internal Complaints Committee

Reporting a complaint

Any women (Complainant) employee, who feels subjected / alleges to any act of sexual harassment, should:

- Tell the person the behavior is unwelcome and ask to stop or
- Asks for the behavior to be dealt with Informal and or use the Formal Procedure as detailed below
- Keep a record of incidents (date, time, locations, possible witnesses, what happened, your response) to help you remember details in case of complaint.

Informal Procedure

- She may approach someone whom she feels confident and comfortable to approach such as own Manager, or the Manager of the person responsible for the behavior or Human Resources.
- The person approached will endeavor to assist the women employee of the behavior to resolve the matter by means of informal meetings and discussions.
- All persons involved in seeking resolution of the unwelcome behavior will respect the dignity and confidentiality of the persons involved.
- The informal resolution to be notified to the Internal Complaints Committee (ICC) at workplace through an email.

Formal Procedure

- If an issue cannot be immediately resolved, the women should immediately report the matter to Internal Complaints Committee (ICC) at the workplace (as per the list of members provided in the

Annexure Table A of the policy).

- The person shall report the matter by writing using the Complaint Form (Annexure B) along with supporting documents, the names and addresses of the witnesses to the email-id of ICC as per the Annexure Table A, this email will be automatically forwarded to the Presiding officer & ICC members at that workplace.
- The ICC will follow the enquiry process and will maintain a register to endorse the complaint received by it and keep the contents confidential, except to use the same for discreet investigation.
- In case of any complaint against an ICC member, then the women (complainant) may directly write to the presiding officer or Management Committee (Head HR & Head Legal) and the ICC will be reconstituted by replacing the concerned member.

Prohibition of Victimization

- The Company forbids retaliation against anyone for reporting harassment, assisting in making a harassment complaint, or cooperating in a harassment investigation.
- No person shall be victimized for anything said or done in relation to any complaints or proceeding under this policy.
- In case of any victimization, such matter to be promptly reported to ICC or the Management Committee (Head HR & Head Legal) or CEO.

Victim Protection

- **Victim Protection:** Organization is committed to providing support and protection to victims of sexual 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 sexual harassment, participate in an investigation, or provide information related to a compliant.
- Retaliation includes , but is not limited to, demotion, termination, harassment, discrimination, 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 Managing Committee of the organization. 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 immediately.

Internal Complaints Committee

- An Internal Complaints Committee constituted at workplace for redressal of sexual harassment complaint and for ensuring time bound treatment of such complaints.
- Member details of the Internal Complaints Committee (ICC) as per the Annexure Table A.
- The ICC shall be objective and will respect the dignity and confidentiality of the persons involved.

Enquiry Process

- After every complaint received, the Presiding Officer having regard to the nature of the complaint shall call a meeting of the Complaints Committee. The Complainant may be heard at this meeting and satisfied that no prima facie case of Sexual Harassment is made out against the Respondent, it shall, after recording its reasons in writing, dismiss the complaint and inform the Complainant accordingly.
- In the event that the ICC comes to the conclusion that there exists a prima facie case of Sexual Harassment allegedly committed by employee, it shall initiate further Enquiry into the matter.

Dispute resolution prior to enquiry

- The Internal Complaints Committee may if, and only if so requested by the complainant, try to resolve and take steps to settle the matter mutually before the commencement of the formal enquiry proceedings.
- The person to carry out the Dispute Resolution Process shall be chosen from the Internal Complaints Committee by the complainant.
- The ICC shall record the settlement arrived and provide the report of resolution to the Management Committee. The copies shall be provided to the complaint and the respondent.
- No further enquiry to be conducted.

Conducting of enquiry

- Where no Dispute Resolution process has been requested by the complainant, or if requested and carried out, has not been successful, the Internal Complaints Committee on the complaint raised by the women shall proceed to conduct a full enquiry into the allegation of sexual harassment.
- The ICC shall explain to both the complainant and defendant the procedure which will be followed in the enquiry.
- The enquiry will be conducted impartially.
- The Committee shall see that every reasonable opportunity is extended to the complainant and to the respondent, for putting forward and defending their case.
- The ICC shall make enquiry into the complaint and order for summoning and enforcing the attendance of any person and examining on oath, requiring the discovery and production of documents.

Recommendation of ICC

The ICC based on the enquiry may arrive at any of the following conclusion and recommend the actions	
Conclusion of enquiry	**Recommendation**
The complaint is not proved against the respondent	Shall recommend for no action to be taken
The complaint is proven against the respondent	Shall recommend for taking action for sexual harassment as misconduct
The complaint is proven to be malicious intent and false evidence	On further enquiry will recommend taking disciplinary action against the complainant or the person who provided any false evidence

- The ICC shall complete the enquiry within reasonable period but not beyond three months and communicate its finding and recommend to Management Committee (Head HR, Head Legal & Head Finance).
- A copy of the enquiry report will be provided to the complainant and the respondent.

Action of sexual harassment

- Where the Internal Complaints Committee arrives at the conclusion that the allegations against the respondent are proven, will submit the enquiry report and recommend to Management Committee to take action.
- The Management Committee, shall take appropriate disciplinary action, based on nature of the complaint, ICC findings and the recommendations.
- The severity of the disciplinary action shall be determined by the severity and/or frequency of the offense(s). The complainant and the respondent (harasser) shall both be notified of the action(s) to be taken.
- Appropriate disciplinary action leading up to termination of services (as may be applicable).

Action on false or malicious complaint

- If during the course of investigation, it is concluded that the harassment complaint was with a malafide motive or produced misleading or forged documents by the complaint or witness then complaint becomes null and void and strict disciplinary action leading up to termination of services as deemed appropriate shall be taken against the complainant based on the recommendation of ICC by the Management Committee
- Mere inability to substantiate a complaint will attract no liability.

Appeal to the management committee

- The Appeal can be made on the recommendation of the ICC to the Management Committee by the complainant or the respondent.
- Based on the review of facts and the committee report the Management Committee decision shall be deemed to be final and abiding.

Awareness of the policy

- As a preventive mechanism all employees will be given training on the policy.
- Members of ICC instrumental in implementing the policy and procedure shall undergo special program on the sexual harassment policy

Confidentiality

- At all stages of the procedures, informal and formal, and from the first discussions when the potential allegations of sexual harassment are discussed, all parties to the discussion or any individual are required to be aware of the sensitivity of the matters under discussions, the potential impact on individual lives and careers, and to exercise extreme caution in the disclosure of the information, and where possible to maintain the confidentiality of the receiver and complainant and the person responsible for the behavior.
- It is prohibited to discuss, publish or matter known internally (with other employees) or externally (with public, press, media) in all manners of the contents, identity of the complaint, respondent, witnesses, and any information relating to conciliation or enquiry proceedings or an action taken by the employer by all individuals.
- Any violation of the prohibition would lead to appropriate disciplinary action

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
12th May 2014	9th Jan, 2017	29th May, 2018	26th June, 2021
4th Amendment	**5th Amendment**		
23rd July, 2024	10th Oct, 2024		