

**Sandor**

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# **SANDOR LIFE SCIENCES PRIVATE LIMITED**

**POLICY**

**ON**

**PREVENTION OF SEXUAL HARASSMENT (POSH)**

## **POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) OF SANDOR LIFE SCIENCES PRIVATE LIMITED**

### **1. PURPOSE:**

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees.

As per the guidelines of “THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION & REDRESSAL) ACT, 2013,

### **2. SCOPE:**

SLSPL aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in SLSPL towards any other person being an employee of SLSPL, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

**3. APPLICABILITY:** All employees of SLSPL of registered office, Branch office, Administrative office, corporate office, warehouse, at all locations.

### **4. DEFINITIONS:**

“**Act**” means The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

“**Employee of SLSPL**” includes person carrying out any work on behalf of SLSPL and may have been hired as including Board of Directors, permanent management, Employees and workmen, temporary, trainees and employees on contract at their workplace or at client sites either directly or indirectly or through vendor organization.

“**Sexual Harassment**” harassment of an employee consisting of following unwelcome acts or behavior (whether directly or by implication) namely:—

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

“**Aggrieved Employee**” in relation to workplace means,

a. an Employee of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

b. in relation to a dwelling place or house, an Employee of any age who is employed in such a dwelling place or house;

“**Respondent**” Employees against whom the complaint has been filed.

References- Code of Conduct Policy

“**Workplace**” includes—

(i) any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate Government or the local authority or a Government company or a corporation or a co-operative society;

(ii) any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;

(iii) Hospitals or nursing homes;

(iv) any sports institute, stadium, shopping complex, sports complex or competition or games venue, whether residential or not used for training, sports or other activities relating thereto;

(v) Any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey;

(vi) A dwelling place or a house;

## **5. DUTIES OF EMPLOYER.**

Every employer shall:-

(a) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;

(b) Display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee.

(c) Organize workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;

- (d) Provide necessary facilities to the Internal Committee or the Local Committee, as the case may be, for dealing with the complaint and conducting an inquiry;
- (e) Assist in securing the attendance of respondent and witnesses before the Internal Committee;
- (f) Make available such information to the Internal Committee, as it may require having regard to the complaint made;
- (g) Provide assistance to the him/her if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force;
- (h) Cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- (i) Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;
- (j) Monitor the timely submission of reports by the Internal Committee.

## **6. POLICY GUIDELINES:**

- (1) No Employee shall be subjected to unwelcome sexual harassment at any workplace.
- (2) 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:—
  - (i) Implied or explicit promise of preferential treatment in his/her employment; or
  - (ii) Implied or explicit threat of detrimental treatment in his/her employment; or
  - (iii) Implied or explicit threat about his/her present or future employment status; or
  - (iv) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
  - (v) Humiliating treatment likely to affect his/her health or safety.

## **7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:**

## OPTION-1: INFORMAL RESOLUTION OPTIONS:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances.

The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter

## OPTION-2: REGISTER COMPLAINTS:

An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options (STEP - 1), shall submit a compliant in writing to [shcomplaint@SLSPL.co.in](mailto:shcomplaint@SLSPL.co.in) or the complaint shall have to be in writing and can be in form of a letter, to be send in a sealed envelope, preferably within 3 months from the date of occurrence of the alleged incident act of Sexual Harassment.

If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

## 8. INTERNAL COMMITTEE:

a. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Committee consisting of:

<b>Internal Complaints Committee of SANDOR LIFE SCIENCES PRIVATE LIMITED</b>		
<b>Presiding Officer</b> <b>( to be woman who is senior position and is on the role of the company)</b>		
<b>Member</b>	-	Dr. Madhur Rekha
<b>Member</b>	-	Mr. Ramakanta Tripathy
<b>Member</b>	-	Mrs. C S V Triveni
<b>External Member</b>	-	Mrs. Nihita Nagajayanthi

b. Within 3 working days, the Internal Committee shall commence Official Internal Enquiry by:

- I. By informing the said complaint to the respondent.
- II. By instructing to stop the alleged act of Sexual Harassment immediately.

- III. By informing not to reach out to the complainant directly or indirectly.
- IV. BY asking an immediate explanation from him/her to the same.

c. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by SLSPL in order to stop the alleged act(s).

d. Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s)

e. A complaint will be closed no later than 30 days from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.

f. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.

g. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Presiding Officer.

h. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

## **9. REDRESSAL:**

1. An amicable resolution of the complaint is possible only with the written consent of the complainant.

2. Within 24 hours of closing the case file, the Presiding Officer shall present the same to and inform its decision to both Complainant and Respondent.

3. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.

4. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.

5. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,

- Warning - Written apology from offender,
- Bond of good behavior
- Transfer/Debaring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

Annual report summarizing complaints and redressal of Sexual Harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

## **10. CONCILIATION.**

The Internal Committee may, before initiating an inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. Provided no monetary settlement shall be made as a basis of conciliation.

Where a settlement is arrived, no further inquiry shall be conducted by the Internal Committee.

## **11. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE:**

Where the Internal Committee, arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer or Presiding Officer, as the case may be, to take action against the woman or the person who has made the complaint, as the case may be, in accordance with the provisions of the service rules applicable to her or him or where no such service rules exist, in such manner as may be prescribed.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section:

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.

Where the Internal Committee, arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness or the Presiding Officer, as the case may be, to take action in accordance with the provisions of the service rules applicable to the said witness or where no such service rules exist, in such manner as may be prescribed.

## **12. DETERMINATION OF COMPENSATION.**

For the purpose of determining the sums to be paid to the aggrieved woman the Internal Committee, shall have regard to—

- (a) The mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- (b) The loss in the career opportunity due to the incident of sexual harassment;
- (c) Medical expenses incurred by the victim for physical or psychiatric treatment;
- (d) The income and financial status of the respondent;
- (e) Feasibility of such payment in lump sum or in installments.

## **13. PROHIBITION AND PENALTY OF PUBLICATION OR MAKING KNOWN CONTENTS OF COMPLAINT AND INQUIRY PROCEEDINGS.**

Notwithstanding anything contained in the Right to Information Act, 2005 (22 of 2005), the contents of the complaint made, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee or the Local Committee, as the case may be, and the action taken by the employer the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner.

Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this Act,



be published, communicated or made known to the public, press and media in any manner , about the contents of the complaint made, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee or the Local Committee, as the case may be, he shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed.

Provided information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

#### **14. RESPONSIBILITIES OF ALL EMPLOYEES FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE:**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Thank you.....

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