



Prevention of Sexual Harassment at Workplace (POSH)

Medicamen Biotech Limited strives to create a healthy, safe and unbiased working environment for all the employees during the course of employment at Workplace

Revised Policy Document Issued on: 1st April 2025

1. Preamble

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. Medicamen Biotech Limited provides equal employment opportunity to all its employees and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The sexual harassment of a woman results in violation of her fundamental rights to equality under Articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under Article 21 of the Constitution of India and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. MBL as a responsible corporate does not tolerate any form of harassment or discrimination.

The protection against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), which has been ratified on the 25th June, 1993 by the Government of India. It is expedient to make provisions for giving effect to the said Convention for protection of women against sexual harassment at workplace.

The “Policy on Prevention of Sexual Harassment of women at workplace”, Medicamen Biotech Limited intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

2. The Related Indian Law

No employee employed with the company shall engage in any act of sexual harassment against women employees of Medicamen Biotech Limited or partner organizations of Medicamen, consultants, service providers, contractors, interns, visitors etc (referred to as “women”). The occurrence of any such act is treated as a gross misconduct and shall be punishable in accordance with the Disciplinary Policy of the Company.

In compliance and in accordance with **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and its Rules, (referred to as “Act”) for providing protection of women as referred herein above against sexual harassment at its workplaces, and for prevention, prohibition and redressal of complaints of sexual harassment, and for matters connected therewith or incidental thereto, the present policy of the company regarding sexual harassment of women at workplace shall govern and would be made applicable.

3. Scope:

This Policy shall deal with all allegations/complaint(s) of Sexual Harassment committed by an Employee(s) against a woman as referred herein above, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises but that constitutes workplace. All Complaints in connection with alleged Sexual Harassment of women will be addressed in compliance and in accordance with the provisions of Sexual Harassment at workplace (Prevention, Prohibitions and Redressal) Act 2013.

4. Definitions:

- 4.1 “Employee”** for the purpose of this policy, an employee is a person employed at MBL payroll or person deployed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.
- 4.2 “Employer”** means any person responsible for the management, supervision, and control of the workplace.
- 4.3 “Aggrieved woman”:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
- 4.4 “Respondent”:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
- 4.5 “Workplace”:** In addition to the place of work all other offices and premises such as Head office / Branch offices, regional offices, Stores, RDCs, and Factories or other premises where MBL’s business is conducted, including guest houses and any place visited by the employee arising out of or during employment including transportation provided by MBL for undertaking such a journey. It shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work/meeting, during and/or arising out of employment/ contract/ engagement with MBL, including transportation provided for undertaking such a journey.

Explanation: For the purposes of clarification “Management” includes the person nominated by the board or committee responsible for the formulation and administration of policies for the organization.

4.6 “Sexual Harassment”

- a) Sexual harassment is unwanted conduct of a sexual nature. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person’s body made in their presence or directed toward them.
- c) Any other unwelcome physical, verbal, or non-verbal gesture or conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

The sexual harassment would also mean in the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined above and an act that constitutes sexual harassment within the meaning of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

- (i) Implied or explicit promise of preferential treatment at work; or
- (ii) Implied or explicit threat of detrimental treatment at work; or
- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with work or creation of an intimidating or offensive work environment; or
- (v) Humiliating treatment is likely to affect health, safety or self-esteem.

Note: All acts of sexual harassment by an employee of the company at the workplace, to a woman who may or may not be an employee of the company would come within the meaning of Sexual Harassment of Women within the meaning of this policy.

4.6.1. “Virtual Sexual Harassment”

MBL has moved to a virtual workspace be it staying in touch via smartphones or web callings, etc. With this change in the work environment, it is essential that the employees and managers conduct in a professional manner all such virtual interactions as well. A few of the guidelines on virtual interaction are as below.

Do’s:

1. Proper Attire - Employees attending video conferences must be dressed appropriately as expected in a professional environment.
2. Content of Conversation - Keep the conversation specific to work areas, projects, deliverables.

Don’ts:

1. Employees should not attend video conferences wearing dresses such as vests, shorts, T-Shirts with suggestive phrases etc.
2. The background of the video call should be suitable. No poster with suggestive content or any other element should be visible during the video calls.
3. No inappropriate jokes should be made.
4. Managers must not insist that female colleagues log on to one-on-one video calls but have the option to take calls in “audio-only” mode.
4. Late night video calls to be avoided. If it is a business emergency, then the employee can attend it on “audio only mode”.

5. Policy Statement

- a) All MBL employees will maintain high standards of dignity, respect, and positive regard for one another and with all those to whom this policy is applicable, in all their dealings.
- b) All MBL employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All MBL employees are required to maintain a work environment, which is free from any kind of harassment.
- d) MBL employees will refrain from committing any acts of sexual harassment at workplace.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) MBL employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

6. Process

Internal Complaints Committee (ICC)

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;

- (iii) One outside member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- (iv) Each member of the Internal Complaints Committee shall hold the position for three (3) years from the date of nomination.
- (v) The Presiding Officer or the members can be removed from the Internal Complaints Committee due to contravention of any of the provision of the Act or other disqualifications as defined in the Act:

The ICC shall under the authorization of the board of directors or committee responsible for formulation and administration of policies for the organization or any other Senior officer or Director/ Managing Director nominated by the board or committee, have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

7. Grievance Procedure

- a) An aggrieved woman ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an ("Respondent") who could be an employee or anyone else upon whom this policy is applicable, with any of the members of the Panel or through whistle Blower platform within time not later than three months from the date of occurrence of the alleged incident. However, it is expected
- b) that any such matter must be reported as early as possible to the Internal Complaint Committee without any delay in the larger interest of justice.
- c) If the Complainant feels that she cannot disclose her identity for any reason with the Panel members, she can address the complaint to the Managing Director/Whistle officer of the Company or management, whereupon the process shall be undertaken in accordance with law.
- d) Such a Complaint shall necessarily be in writing or video her email and the Complainant shall sign at the foot of each page of the Complaint.
- e) The Complaints Committee will hold a meeting with the Complainant within a period of seven days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same. However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.
- f) A copy of the complaint shall be shared with the Respondent with some advice to submit his/ her reply along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of the documents.
- g) The Complainant shall be granted an opportunity to record her statement to prove her allegations and may record the statement of an employee as witness, and produce corroborative material with documents, etc., to substantiate her complaint/ allegations.

- h) The Respondent shall be granted an opportunity to record his/ her statement and produce evidence in his/ her defense.
- i) The Internal Complaint Committee have the right to close the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved (complainant) or Accused (respondent) fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Presiding Officer, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.
- j) In case the complaint made by the complainant is found to be false and malafide at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Service Rules.
- k) The Internal Complaints Committee shall complete the “Enquiry” within 90 days from receipt of the complaint and submit its report with its findings to the Management within a period of ten days from the date of completion of the enquiry and such report be made available to the concerned parties.
- l) In case the Complainant fails to prove her allegations made in her complaint, the matter shall stand closed.
- m) In case the Respondent is found guilty of the act of sexual harassment as mentioned in the complaint, the management shall take appropriate action him in accordance with the applicable provisions of law.
- n) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- o) Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made and/or findings of the ICC, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

8. Procedure for Conciliation

The Aggrieved Woman may approach the Committee and choose the option of Conciliation. The Committee, if satisfied that the proposed conciliation is without any undue pressure, influences and without any monetary settlement (e.g. promotion, bonus, financial compensation etc.) and will resolve the matter, then the Committee before commencement of the Enquiry may initiate appropriate steps.

- (i) Recording of such settlement in writing basis of such conciliation agreed by the parties.
- (ii) Where the settlement has been arrived, the Internal Complaint Committee shall provide the copies of the settlement to the aggrieved woman and respondent. The Internal Complaint Committee shall also provide a copy of the settlement to the employer with a recommendation for no further inquiry is required.
- (iii) If the settlement does not arrive the ICC must initiate a formal enquiry into the complaint. If the settlement is reached and the Respondent does not comply with its terms, then the complaint committee must proceed with the Enquiry.

9. Essential requirements of a Complaint:

- a) Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the internal Complaints Committee.
- b) Where the aggrieved woman is unable to make a complaint on account of her physical/mental incapacity, a complaint may be filed by her relative, friend, co-worker or any person who has knowledge of the incident with the consent from aggrieved woman and/or jointly with her relative or friend.
- c) A complaint must specify the details of the incident in clear language with full particulars.
- d) Date, time and place of Incident must be clearly and unambiguously mentioned in the complaint.
- e) The complaint must disclose the acts committed by the Respondent in clear and unambiguous terms.
- f) If any specific words have been used or any gesture demonstrated by the Respondent that must be explained in detail.
- g) The complaint must disclose in whose presence the misconduct has been committed by the Respondent so that those persons could be called as witnesses to verify the alleged incident.
- h) The complaint, if possible, should also mention about the material evidence that could substantiate the allegations to enable the Internal Committee to investigate into the same in an effective and efficient manner and reach to a just conclusion.

10. Responsibilities of the Management:

The management shall treat sexual harassment as a gross and unacceptable misconduct under the disciplinary policy and act for such misconduct.

The management shall undertake necessary awareness program and preventive measures against sexual harassment of women at workplace.

These would include:

- a) Display at any conspicuous place in the workplace a copy of this policy
- b) Organize periodical workshops and awareness programs at regular intervals for sensitizing the employees as required under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and any other relevant awareness and training programs for women employees.
- c) Organize regular specialized orientation programs for the members of the Internal Committee for dealing with the cases of sexual harassment.
- d) Provide necessary assistance and facilities to the Internal Committee to deal with the complaint and for conducting inquiry.
- e) Make available such information to the Internal Committee as may be required having regard to the complaint received.
- f) Provide support to the Complainant if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.

11. Responsibilities of the Employees:

- a) All employees of the Company have a personal responsibility to ensure that they have read the policy document and adhere to the same.
- b) All employees shall strictly follow the obligations of confidentiality as required in this policy.

12. Manner for Taking Action for Sexual Harassment

- a) In case of allegation proved: Internal Complaint Committee, bases on its investigation and findings arrived at the conclusion that the allegation against the respondent has been proved. It shall recommend to the employer to take any action against the respondent as per the MBL's service rules including:
- Written apology
 - Warning letter
 - Reprimand or censure
 - Withholding of promotion
 - Withholding of pay rise or increments
 - Deduction from salary
 - Termination from service
 - Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, medical expenses) in lump sum or in instalments
 - Undergoing a counselling session
 - Transfer to another workplace

If the complaint is of a serious nature, involving threats of reprisal or risk of recurrence or refusing the order/judgment of the employer, then a criminal case shall be filed against him/her before the police/court at the discretion of the Complaint Committee.

- b) In case of allegation not proved: Where the allegations against the respondent have not been proved, the Internal Complaint Committee shall provide a report to the employer with recommendation that no action is required, and the copy of the report will be provided to respondent and aggrieved woman.

13. Action for Malicious Complaint or False Evidence

- a) Internal Complaint Committee, based on its investigation and findings arrived at the conclusion that the allegation against respondent is malicious or made the complaint knowing it to be false or has produced any forged or misleading document or witnesses, it shall recommend to the employer to take any action against the complainant as per the MBL's service rules.
- b) Failure to provide sufficient information or evidence shall not be considered as a malicious complaint.
- c) The Internal Complaint Committee shall ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

14. Confidentiality:

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, findings of the Internal Committee and the action taken by management of Medicamen Biotech Limited shall not be published, communicated, or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence, and will be investigated promptly in an impartial manner. For completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

15. Applicability:

The Policy shall be already operational, and this revision shall become operational from 1st April 2025.

16. Internal Complaints Committee (ICC) Composition:

To remain more accessible and substantially compliant in law while dealing with the issues of sexual harassment of employees at workplace, the management has decided to restructure the Internal Committees to make it more region specific as under:

The Internal Complaints Committee shall be comprised of one core committee.

INTERNAL COMPLAINTS COMMITTEE (ICC) CENTRAL (CORPORATE OFFICE):

The Central Committee (Core Committee) shall consist of the following committee members:

Chairperson: Ms. Sangeeta Bishnoi- Independent Director

Members:

1. Ms. Parul Choudhary- Company Secretary
2. Mr. Uday Saxena – Head HR
3. Ms. Manisha Mathur- Assistant HR
4. Ms. Neelima Shrawat (External Expert)

INTERNAL COMPLAINT COMMITTEE (BHIWADI):

Chairperson: Ms. Sangeeta Bishnoi- Independent Director

Members:

1. Ms. Parul Choudhary- Company Secretary
2. Mr. Uday Saxena – Head HR
3. Ms. Ekta Tiwari – Executive (R&D)
4. Mr. Neelima Shrawat (External Expert)

INTERNAL COMPLAINT COMMITTEE (HARIDWAR- UNIT-I):

Chairperson: Ms. Sangeeta Bishnoi- Independent Director

Members:

1. Ms. Parul Choudhary- Company Secretary
2. Mr. Uday Saxena – Head HR
3. Ms. Archana Singh – Head (QC)
4. Ms. Neelima Shrawat (External Expert)

INTERNAL COMPLAINT COMMITTEE (HARIDWAR- UNIT-II):

Chairperson: Ms. Sangeeta Bishnoi- Independent Director

Members:

1. Ms. Parul Choudhary- Company Secretary
2. Mr. Uday Saxena – Head HR
3. Ms. Stuti Choubey – Officer (QC)
4. Ms. Neelima Shrawat (External Expert)

- Further, as also required by the law, to prevent the possibility of any undue pressure or influence, the Internal Committee shall have an external member who is familiar with the issue of sexual harassment.
- The minimum quorum out of the 5 members (including the Chairperson) three member are must for conducting all the proceedings in respect of the Sexual harassment cases.
- In the event any member of the aforesaid committee ceases or exits its association with the Company for whatever reason, the Management shall appoint a replacement of the same within 30 days thereof. Further, if a member wishes to voluntarily resign for the Complaints Committees, he/she shall submit its resignation to the Management.
- The Presiding Officer (Chairperson) and every Member of the Internal Committee shall hold office to a maximum period of three years, from the date of their nomination.
- The External member of committee shall be paid such fees or allowances for holding the proceedings of the Internal Committee, as may be agreed between the management and the member.

17. General Instructions

Protection against Victimization as an interim measure

- The Company/management is duty bound to take appropriate steps to prevent sexual harassment.
- The victim of Sexual Harassment has the option to seek transfer of the perpetrator or her own transfer from one department/branch/station to another.
- The Aggrieved Woman may seek transfer to another workplace
- The Aggrieved Woman may seek for leaves for up to 3 months which will be in addition to the leave she is already entitled to.

Obligation of the Management

The Management of the Company shall provide all necessary assistance ensuring effective implementation of this policy.

Third Party Harassment

Where sexual harassment occurs because of an act or omission by any third party or an outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

Annual Report

The Internal Complaint Committee shall prepare in such form and at such time as may be prescribed an Annual report at the end of each Calendar/financial year of the Company, giving a full account of its activities during the previous year and forward a copy thereof, to the Management or the person/committee nominated and forward the consolidated report as mandated under the Act to the concerned Authorities.

Modification and Review of the Policy

The Company reserves the right to modify and, or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this

Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications shall be notified by the Company to its employees in due course.

Policy Availability

The Policy will be available to all employees on www.medicamen.com

Mechanisms to Strengthen Implementation of Policy

- a) Communication of policy and making it available to all employees.
- b) Display at any conspicuous place at the workplace – the constitution of Internal Complaints Committee and penal consequences.
- c) Making it a part of corporate induction program.
- d) Organize workshop for Internal Complaint Committee and awareness program for employees

