

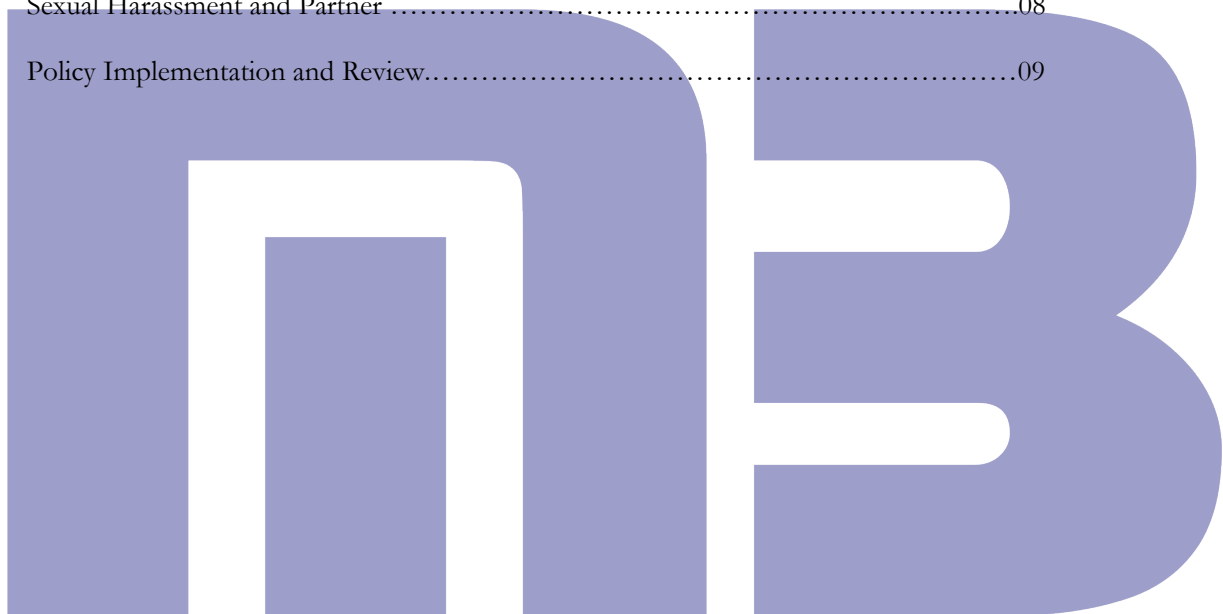


Prevention of Sexual Harassment at Workplace (POSH)

The Anti-Bribery and Anti-Corruption emphasizes MBL zero tolerance approach to bribery and corruption. It guides us to act professionally, fairly and with utmost integrity.

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1. POLICY STATEMENT

- 1.1. The **Medicamen Biotech Limited** is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and a harassment free workplace to all employees without regard to race, marital status, gender, sexual orientation, age, nationality ethnic origin, caste, religion, colour or disability. The company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than work place if involving an employee(s) is a grave offence and is therefore, punishable.
- 1.2. This policy may be called the Policy on “**Prevention of Sexual Harassment at the Workplace**” (hereinafter referred to as “**the Policy**”)
- 1.3. The policy has been framed in accordance with and to comply with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as “**the Act**”) and Sexual Harassment at The Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as “**the Rules**”) including the amendment(s) to the Act and the Rules from time to time and/ or any statutory re-enactment of the Act.
- 1.4. **Medicamen Biotech Limited** (hereinafter referred to as “**the Company**”) strives to create a healthy, safe and unbiased working environment for all the employees during the course of employment at Workplace (as defined hereinafter).
- 1.5. **Sexual Harassment** (as defined hereinafter) at workplace is strictly prohibited.
- 1.6. At **Medicamen Biotech Limited**, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have responsibility to
 - High standards of work ethics & abide by the law.
 - Treat each other with dignity and respect.
 - Refrain from any unwelcome behavior that has sexual implications.
 - Refrain from creating hostile work environment at workplace.
 - Report sexual harassment experienced and/ or witnessed to appropriate authorities and abide by the compliant handling procedure of the company.
- 1.7. All existing policies guidelines etc issued by the company on prevention of sexual harassment at the workplace, stands superseded by the policy.

2. APPLICABILITY

The policy shall apply to dealing with any allegation/complain of Sexual Harassment at the workplace. It is clarified that the policy shall apply in case of Sexual Harassment of an Aggrieved Employee (as defined hereinafter) at the workplace unless otherwise excluded herein.

3. DEFINITION

- 3.1. “**Aggrieved Employee**” means in relation to a workplace, an employee of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent.
- 3.2. “**Chairperson**” means the chairperson of the Committee as defined under provision 4 (c).
- 3.3. “**Company**” means Medicamen Biotech Limited.

- 3.4. **“Committee”** means an ‘Internal Complaints Committee’ constituted as per provision 7 of the Policy.
- 3.5. **“Employer”** means any person responsible for the management, supervision and control of the Workplace, provided that management includes the person or board or committee responsible for formulation and administration of policies for such organization.
- 3.6. **“Respondent”** means the person against whom the complainant has made a complaint.
- 3.7. **“Complainant”** means any aggrieved individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this policy.
- 3.8. **“Employee”** means a person employed at a workplace for any work on regular, temporary, deputation, consultants, part time, 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 include a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 3.9. **“Workplace”** means premises locations, establishments, enterprises, institutions, offices, branches or unit established, owned, controlled by the Medicamen Biotech Limited. Places visited by the Employee arising out of or during the course of employment including official events, transportation, and accommodation provided by the employer for undertaking such journey.
- 3.10. **“Incident”** means an incident of Sexual Harassment as defined in provision 4.2 & 4.3.

4. SCOPE

- 4.1. The Policy extends to all employees of the company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.
- 4.2. Sexual Harassment would mean and include any of the following but not limited to :-
- Verbal/visual/physical/sexual demands.
 - Any unwelcomed, inappropriate act at the work place which is sexual in nature.
 - Explain that workplace can be outside work too: Some of these include, but are not restricted to- Cab/transport provided by company, social events by company, calling colleagues late at night, sending inappropriate messages through social media platforms or on phone. (Any Vulgar & indecent behavior shall qualify for harassment)
 - Relentlessly pursuing someone, explain it’s important to say NO, if not interested!
 - Sending inappropriate jokes and messages, sms/mms/emails containing inappropriate material.
 - Viewing/showing pornography. Employees are also not allowed to view any such sites through the office network.
 - Physical contact and advances. Employees to refrain from inappropriate touch & gestures which can make people uncomfortable.
 - Employees should not demand or request for sexual favors, neither should force anyone to get into a relationship.
 - Making sexually colored remarks also accounts for sexual harassment.
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - Spreading rumors can damage the reputation of a colleague, be careful.

4.3. New Aspects of Sexual Harassment as per the current legislation:-

- **Hostile work environment:** Insensitive jokes and comments: Be careful of your language. Abusive language even amongst friends may impact the employees around you.
- **Quid pro quo:** Promises or threats in relation to work related benefits/favors.

4.4. Do's and Don'ts

- Maintain confidentiality, don't speak to everyone, and escalate matters to HR/ICC members immediately.
- False cases or matters filed with malicious intent will be viewed very seriously.
- Please do not fabricate stories with respect to Sexual Harassment.
- The company has zero tolerance on retaliation (Don't worry, you will not suffer at work if you report an issue)
- We are keen to create a safe working environment for all our employees.
- If you have received any indecent SMS/MMS or email, escalate matters to HR/ICC members immediately.

5. PREVENTION ACTION

The Company will take reasonable steps to ensure prevention of sexual harassment at work through awareness workshops, PSH policy displayed over company intranet to all employees, common information mailers and circulating articles on the same as an when.

6. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

- 6.1. Every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the "Internal Complaints Committee": Provided that where the offices or administrative units of the workplace are located at different places or divisional or sub-divisional level, the Internal Committee shall be constituted at all administrative units or offices.
- 6.2. The Internal Committee shall consist of the following members to be nominated by the employer, namely:
- 6.3. A Chairperson/Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees: Provided that in case a senior level woman employee is not available, the Chairperson/Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub-section (1): Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Chairperson/Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.
- 6.4. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; Out of these two, at least one should be a HR representative.
- 6.5. One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment: Provided that at least one-half of the total Members so nominated shall be women.
- 6.6. The Chairperson/Presiding Officer and every member of the committee shall hold office for period not exceeding three years from the date of nominations.
- 6.7. Corporate HR shall be responsible for finalizing all the Members of the committee, including Chairperson, for all administrative units / offices, in consultation with respective Unit HR Heads

- 6.8. The committee members, unit HR representatives and functional heads will be provided necessary training inputs to handle such issues effectively and with required sensitivity and concern.
- 6.9. Members appointed from amongst non-governmental organizations shall be entitled to a due allowance per meeting of the committee and appropriate travel arrangements. Unit HR shall be responsible for payment of such allowance and making necessary travel arrangements
- 6.10. A Chairperson/Presiding Officer or any of the Members shall be removed from the Committee in case he / she:
- Has abused his / her position so as to render his / her continuance in office prejudicial to the public interest, or
 - Has been convicted for any offence or an inquiry into an offence under any law for the time being in force is pending against him / her, or
 - Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her.
- 6.11. The Internal complaints committee is responsible for :-

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiate allegations of sexual harassment.
- Discouraging and preventing employment related sexual harassment.

7. PROCEDURES FOR DEALING WITH COMPANIES

The Company is committed to providing a supportive environment in which the concerns of sexual harassment shall be resolved as follows:-

7.1 Informal Resolutions Options:

- When an incident of sexual harassment occurs, the victim of such conduct can communicate his/her 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, he/she can bring his/her concern to the attention of the Internal Complaints Committee for redressal of his/her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

7.2 Complaints

- Any aggrieved employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Internal Complaints Committee constituted by the Management.
- Any aggrieved employee may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaint Committee within a period of **3** months from the date of incident and in case of series of incidents, within a period of three months form the last incident.
- Provided that where such complaint cannot be made in writing, the chairperson/presiding officer or any member of complaints committee shall render all reasonable assistance to the aggrieved employee for making the complaint in writing.
- Alternately, the employee can send complaint through an email. The employee is required to disclose his/her name, department, division and location he/she is working in, to enable the Chairperson to contact him/her and take the matter forward.
- The Complaint Committee shall send 1(one) of the copies received from the aggrieved employee to the accused (respondent) within a period of 7 working days.

- The Accused (respondent) shall file his/her reply to the Complaint along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 working days from the date of receipt of the documents.
- The Complaint committee have the right to terminate 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 Chairperson, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
- In conducting the inquiry, a minimum of 3 Members of the Complaints Committee including the chairperson, as the case may be, shall be present.
- 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 Complaints Committee.
- The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Employer as soon as practically possible and in any case, not later than 10 days from the date of completion of inquiry. The Employer shall act upon the recommendation within 60 days of its receipt by him/her.
- The Complaint's Committee report will also be made available to concerned parties.

7.3 Conciliation

- The Committee may, before initiating an inquiry and at the request / demand of the aggrieved employee, take steps to settle the matter between the Aggrieved Woman and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. Such conciliation should be completed within one month from the date of making the Complaint.
- Where such settlement has been arrived at under provision 6.3, the Committee shall record the settlement so arrived and forward the same to the BU HR Head to take action as specified in the recommendation, under intimation to Corporate HR and no further inquiry shall be conducted by the Committee.
- The Committee shall provide the copies of the settlement, as recorded above, to the Aggrieved Woman and the Respondent.
- If the Aggrieved Woman does not exercise the option of conciliation, the Committee shall proceed to make an inquiry into the Complaint.
- Where the Aggrieved Woman informs the Committee that any term or condition of the settlement arrived as a part of conciliation under provision 6.3 above has not been complied with by the Respondent, the Committee shall proceed to make an inquiry into the Complaint, or as the case may be, forward the Complaint to the Police.

7.4 Action during pendency of inquiry

- Where both the parties are Employees, the Committee shall, during the course of inquiry, provide an opportunity to both the parties to put forward and defend their respective cases. A copy of the findings shall be provided to them to enable them to make representation against the findings before the Committee.
- During the pendency of an inquiry, on a written request made by the Aggrieved Woman, the Committee may recommend to the Business Unit HR Head to:
 - Transfer the Aggrieved employee or the Respondent to other administrative unit / office; or
 - Grant leave to the aggrieved employee up to a period of three months.

The leave granted to the:

- Aggrieved employee under this provision shall be in addition to the leave she would be otherwise entitled; or

- Restrain the Respondent from reporting on the work performance of the aggrieved employee or writing her confidential report, and assign the same to another Employee.

On the recommendation of the Committee, the Business Unit HR Head shall implement the recommendations made and send the report of such implementation to the Committee.

- The Aggrieved employee, Respondent and any other person assisting in the inquiry shall not interfere with the inquiry proceedings. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be directly, indirectly, explicitly or implicitly influenced, coached, coerced, threatened and / or intimidated by the Aggrieved Woman, Respondent or any other person.
- A Committee may seek to obtain assistance from other Internal Complaints Committee of **Medicamen Biotech Ltd.**

7.5 Manner of Taking Action against the Respondent:

Where the Complaints Committee arrives at the conclusion that the allegation against the respondents been proved, it shall recommend to the employer to take action which may include the following:

- Written apology;
- Warning;
- Reprimand or Censure;
- Withholding of Promotion;
- Withholding of pay rise or increments; or
- Terminating the respondent from service; or
- Undergoing a counselling session or carrying out community service.

7.6 Punishment for False or Malicious Complaint and False Evidence:

Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action in accordance with the provisions of the service rules applicable to him/her.

7.7 Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

7.8 Access to reports and Documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

7.9 Protection to Compliant/Victim

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will 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.

7.10 Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

8. SEXUAL HARASSMENT AND PARTNER

The Company encourages its partners to have a commitment to a sexual harassment free working environment within their group of companies. The Company may play a facilitating role in redressal of complaints of sexual harassments in such circumstances.

9. POLICY IMPLEMENTATION AND REVIEW

The Policy will be implemented and reviewed by the Human Resources Department. The Company reserves the right to amend & reinstate the entire policy or any part of it any time.

