



**PREVENTION, PROHIBITION AND REDRESSAL OF
SEXUAL HARASAMENT AT WORKPLACE
INDIA GUIDELINES**

Scope	Piramal Pharma Limited India
Owner	PPL Corporate HR Team PPL
Approved by	POSH ICC Apex Committee
Effective Date	6 November 2023
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*The Company reserves the right to amend & reinstate the entire policy or any part of it any time as per amendments in laws and regulations. The Policy will be implemented by Human Resources Department and reviewed by Legal & Compliance Department.

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PURPOSE

1. Piramal Pharma Limited (hereinafter referred to as “The Company”), is committed to ensuring all Employees are treated fairly and equitably in an environment free of intimidation and sexual harassment. In furtherance of this commitment, the Company strives to provide all of its employees with equal opportunity conditions of employment, free from harassment to create a work environment where everyone has an opportunity to fully participate in achieving business success and is valued for the distinctive skills, experiences and perspectives she or he brings to the workplace.
2. The Company has zero tolerance for harassment, intimidation or humiliation which is sexual in nature and it is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute acts of sexual harassment.
3. The 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.
4. Sexual harassment is an unacceptable form of behavior, which shall not be tolerated under any circumstances. It is also unlawful.
5. All complaints of sexual harassment will be treated seriously and promptly, with due regard to confidentiality. Ignorance of this policy shall not be considered as an excuse.

Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

SCOPE

This policy is gender neutral. It is applicable to all employees, associated with the Piramal Pharma Limited India in a full-time/part-time capacity, as a permanent or temporary employee, contractor, consultant, vendor, intern, volunteer, or visitor, and at their workplace or client sites. All complaints will be dealt with in a just and fair manner and may have serious consequences. The company will not tolerate any form of sexual harassment engaged in by clients, employees, or by suppliers, or any other business associates and is committed to taking all necessary steps to ensure the safety and well-being of all employees and associates.

DEFINITIONS

Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- a. Any unwanted, unwelcome or uninvited behavior of a sexual nature, which makes a person feel humiliated, intimidated or offended. Sexual harassment can take many different forms and may include physical contact and advances, verbal comments, jokes, propositions, the displaying of offensive material, a demand or request for sexual favors or other behavior, which creates a sexually tense or hostile working environment. Sexual harassment can occur between an Employee / Consultant and a co-worker, supervisor, manager, agent, consultant or contractor.
- i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
 - v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
 - vi. Giving gifts or leaving objects that are sexually suggestive;
 - vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
 - viii. Persistent watching, following, contacting of a person; and
 - ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - x. Any form of virtual communication that is sexual, inappropriate in nature.
- b. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
- Implied or explicit promise of preferential treatment in employment;
 - Implied or explicit threat of detrimental treatment in employment;
 - Implied or explicit threat about the present or future employment status; Piramal Pharma Limited
 - Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
 - Humiliating treatment likely to affect their health or safety.
- c. Any form of virtual communication that is sexual, inappropriate in nature.
- d. Hostile Work Environment refers to a work environment when unwelcome physical, verbal, gestural behavior or any written, visual or graphic representations focusing on sexuality is present to interfere with the victim's work performance or be intimidating or offensive to a reasonable person. e. g. certain sexist remarks, display of pornography or sexist or obscene graffiti, physical advances and brushing against any employee.
- e. Quid pro quo refers to sexual favours 'in exchange' of promotion, bonus, perquisites, increment, etc.

Complainant refers to an individual filing the complaint. In a situation where the allegations of sexual harassment are made by a third party against an employee of the company, the company will work to ensure a fair and unbiased inquiry process and take action against the employee accordingly.

Respondent refers to an individual against whose actions complaint has been filed. In a situation where a complaint is made against a third party, the company will be working with the direct employer of the alleged offender to decide the course of action for redressal of the complaint.

Witness is any individual or individuals who have been called upon by either the complainant, respondent, or ICC to report their statements as a part of the inquiry proceedings.

Workplace: In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place which employees visit in connection with their, during the course of and/or arising out of employment/ contract/ engagement with the Company, including transportation provided for undertaking such a journey. Workplace also includes:

- Any other site away from the Company's premises where company-related activities are performed (For example: off-sites, site/plant visits, or Company organized social events, training sessions conducted);
- All work-from-home and virtual communications inclusive of telecommunications and online virtual meetings, emails, or communications that is conducted or shared via any virtual platforms;
- Employees working from remote locations, or even from home and if there are any complaints from either an employee working from home to an employee in office or vice-versa, the Internal Complaints Committee proceedings will accordingly be conducted online as well upon the discretion of the Internal Complaints Committee itself.

Internal Complaints Committee (ICC): The Company has instituted an Internal Complaints Committee (hereinafter referred to as the ICC or Committee) for redressal of sexual harassment complaints and for ensuring unbiased and time-bound resolution of complaints following the regulations laid down by the Act.

The ICC is responsible for conducting an inquiry into every formal written complaint of sexual harassment and making recommendations to the Company on the actions to be taken against the respondent.

[Click here to refer the list of ICC members](#)

Apex Committee is a centralized redressal committee at corporate level constituted by the executive management. The Apex committee works closely with all the ICC's in terms of reviewing and monitoring their functioning with fair and just redressal mechanism. If any party is not satisfied with the redressal process, it can reach out to the Apex committee for review of the inquiry or the resolution. The Apex Committee cannot reverse the order or act as an appellate authority, it can give orders of review of inquiry or recomposition of any ICC if it is of the opinion that a fair resolution has not been given.

ROLES & RESPONSIBILITIES

Company Responsibilities

- i. Have a zero tolerance approach against sexual harassment.
- ii. Create and maintain a safe working environment where all employees are respected and treated with dignity.
- iii. Discuss and display the consequences of sexual harassment at a conspicuous place of the workplace and all office premises.
- iv. Provide assistance to the employees if they wish to file a complaint under the Indian Penal Code.
- v. Take appropriate actions in accordance with law by filing complaints with the right authorities where any conduct that amounts to a specific offence under the Indian Penal Code or any other such penal law prevalent in India at the time.
- vi. In the event of any visitor(s) engaging in sexual harassment or receiving complaints from employees, assist employees in filing complaints with the appropriate authorities under applicable laws enforced and also assist such employees in distress.
- vii. Retaliation against complainant to be dealt with seriously.
- viii. Respect privacy and maintain confidentiality of all parties involved in inquiry proceedings.

Employees' Responsibilities

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to these guidelines. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment. Following are the ways in which this can be done:

- i. Educate oneself by reading these guidelines document and participate in e-learning and trainings.
- ii. Report incidents of sexual harassment to the ICC members immediately.
- iii. Assist in securing the attendance of the respondent during inquiry proceedings.
- iv. Make any such information available to the committee during inquiry proceedings.
- v. Take reasonable care to not create a hostile work environment through actions or behaviour for co-workers and associates.
- vi. Take responsibility to call out unwelcome conduct that is offensive or humiliating.
- vii. Cooperate in the inquiry of proceedings by ICC.

- viii. Maintain confidentiality at all times in the event that you are involved in or have access to information related to any complaint;
- ix. All Employees are encouraged to advise others of behavior that is inappropriate. Some behaviors may not be intentional. While this does not make it acceptable, it does not give the person behaving inappropriately, the opportunity to make amends and stop their offensive behavior.

Manager's Responsibilities

All managers at Piramal Pharma Limited must ensure that nobody is subjected to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

- Create and maintain a work environment where all employees feel safe and respected;
- Be alert to observe any inappropriate conduct or comments;
- Approach the ICC in accordance with these guidelines, when instances of sexual harassment take place within the workplace;
- Discuss and display the consequences of sexual harassment at a conspicuous place of the workplace;
- Assist in securing the attendance of the respondent during inquiry proceedings;
- Make any such information available to the committee during inquiry proceedings;
- Provide assistance to the employees if they wish to file a complaint under the Indian Penal Code;
- The Company may take appropriate actions in accordance with law by filing complaints with the right authorities where any conduct that amounts to a specific offence under the Indian Penal Code or any other such penal law prevalent in India at the time.
- In the event that any visitor(s) engages in sexual harassment or if the Company receives complaints from their employees or consultants, the Company will assist in filing complaints with the appropriate authorities under applicable laws enforced and the Company shall also assist such employees or consultants in distress.
- Ensure all team members have undergone the mandatory POSH e-learning and are present for any additional training sessions on the topic.

HR Responsibilities

- Encourage the complainant to file a POSH complaint with the ICC.
- Ensure confidentiality. You are not liable to inform anyone other than the ICC of the incident, including your reporting manager and business/site heads.
- Be aware that you would be held liable in case the incident is delayed in reaching the respective ICC which could lead to disciplinary action against you.

COMPLAINT & PROCEDURE

1. The Company encourages any Employee who feels they have been harassed, to contact a manager/HR department. The Company aims to provide a working environment that is free of workplace harassment or intimidation.
2. The Company recognizes comments and behavior that do not offend one person can offend another.
3. Management accepts individuals may react differently and expects this right to be generally respected.
4. There is an Internal Complaints Committee constituted (hereinafter referred to as the ICC) for redressal of sexual harassment complaints.
5. An Employee may make a written complaint to the Presiding Officer or any member of the ICC.
6. Any complaints or reports of sexual harassment will be treated promptly, seriously and sympathetically. They will be investigated thoroughly, impartially and confidentially. Managers and supervisors of the Company must act immediately on any reports of sexual harassment. The Employee / Consultants will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.
7. Appropriate disciplinary action will be taken against anyone in the Company employment/engagement who is found to have sexually harassed another employee. Depending on the severity of the case, consequences can include an apology, counselling, transfer, demotion or any disciplinary action leading up to termination from employment. Immediate disciplinary action will also be taken against anyone who victimizes or retaliates against a person who has complained of sexual harassment.

INQUIRY PROCEEDINGS & REDRESSAL

1. The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace. The complaint must be lodged within 3 months from the date of incident/last incident. The ICC can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint. Provided that where such a complaint cannot be made in writing, the presiding officer or any member of the ICC shall render all reasonable assistance to the complainant for making the complaint in writing. If the complainant is unable to lodge the complaint in account of his/her incapacity, the following may do so on her behalf, with his/her written consent.

- Legal heir, relative or friend;
 - Co-worker;
 - Any person having the knowledge of the incident.
2. On receipt of a complaint, the ICC may, at the request of the complainant, take steps to conciliate the complaint between the complainant and the other party. In the event that a settlement has been reached, the ICC shall record the settlement so arrived and forward the same to one of the directors of the Company, to take action as specified in the recommendation.
 3. During pendency of the inquiry, on a written request made by the complainant, the ICC may recommend to the Company to:
 - Transfer the complainant or the respondent to any other workplace;
 - Grant leave to the complainant of maximum 3 months, in addition to the leave he/she would be otherwise entitled;
 - Prevent the respondent from assessing complainant's work performance; or
 - Grant such other relief as may be appropriate once the recommendations of interim relief are implemented, the Company / Firm will inform the committee regarding the same.
 4. On receipt of the complaint, the ICC shall send a copy received from the complainant to the respondent within a period of 7 working days. The respondent shall file his/her reply to the complaint along with a list of documents, and names and addresses of witnesses, within a period not exceeding 10 working days from the date of receipt of the documents.
 5. The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.
 6. The ICC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the presiding officer of the ICC, by giving a notice of 15 days in advance to the other party.
 7. The parties shall not be allowed to bring in any legal practitioner to represent them at any stage of the proceedings before the ICC.
 8. In conducting the inquiry, a minimum of 3 members of the ICC including the presiding officer or the chairperson of the ICC, as the case may be, shall be present. The inquiry has to be completed within a period of 90 (Ninety) days from the receipt of the complaint from the complainant. On the completion of an inquiry, the ICC shall provide a report of its findings to the Company within a period of 10 days from the date of completion of the inquiry and such report be made available to the concerned parties. The Company is required to act on the recommendations of the ICC within 60 (Sixty) days of its receipt. Appeal against the decision of the ICC is allowed within 90 (Ninety) days from the date of recommendations.

9. Where the ICC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.

Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company,

- I. to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent or where no such service rules have been made, action may include:
 - Disciplinary action, including a written apology, reprimand, warning, censure;
 - Withholding promotion/ pay raise/ increment;
 - Termination; and
 - Counselling.
- ii. to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent or to pay such sum as it may consider appropriate to be paid to the complainant or to his/her legal heirs.

10. Where the ICC arrives at the conclusion that the allegation against the respondent is malicious or the complainant or any other person making the complaint has made the complaint knowing it to be false or the complainant or any other person making the complaint has produced any forged or misleading document, it may recommend to the Company to take action against the complainant or the person making the complaint.

COMPENSATION

The purpose of compensation is to put the Complainant in the same position as they were had the harassment not occurred. It is the Respondent who shall be liable to make good the financial loss suffered by the Complainant and not the employer.

In addition to disciplinary action recommended, the ICC is empowered to recommend monetary compensation to the Complainant, factoring in the income and financial status of the Respondent, in the following cases:

- Mental trauma, pain, suffering, and emotional distress;
- Loss in career opportunity;
- Medical expenses (physical and psychiatric).

The compensation amount will be paid in a lump sum or instalments.

CONFIDENTIALITY

The Company understands that it is difficult for an employee to come forward with a complaint of sexual harassment and recognizes his/her interest in keeping the matter confidential. To protect the interests of the aggrieved employee, the employee against whom a complaint is made 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.

NOTICE AND COMMUNICATION

1. The Company has put up details about the guidelines and ICC at conspicuous places in all its office premises to create awareness and abide by law.
2. For complaints under the guidelines, you may write to PPL.POSH@piramal.com or reach out to your Business HR for learning more about your ICC members.
3. Each location / business of Piramal Pharma Limited in India has a duly constituted Internal Complaints Committee, details of which can be obtained by any person by writing in to PPL.POSH@piramal.com. The ICC member details would also be sent over email to all employees and displayed in the notices in each of the locations.

