Prevention of Sexual Harassment Policy

Document ID: HR_TM_PP_009

Version Number: 19.0

Effective Date: 29 October 2026

Approval Information in Annexure Z

Content

1. Introduction....4
2. Purpose and Scope of the Policy....4
3. Policy Description....4
4. Definition of Terms....5
5. Constituents of Sexual Harassment....6
6. Exclusion....7
7. Third Party Harassment....7
8. Prevention of Sexual Harassment....8
9. Zero Tolerance to Retaliation....8
10. Conflict of Interest Policy....8
11. Internal Committee....8
12. Complaint of Sexual Harassment....9
13. Conciliation....11
14. Inquiry of Complaint....12
15. Inquiry Procedure....13
16. Inquiry Report....14
17. Duties of the Employer Penalties....15
18. Appeal....16
19. Local Committee....17
20. Filing of Police Complaints....17
21. Savings....17
22. Examples of Instances Construed as Sexual Harassment....18
23. Annual Report of the IC....19
24. Timelines Under the Act....19

25. Senior Management Approval 20
26. Annexure Z: Revision History 21
    a. Document Approval Information 21
    b. Revision Summary 22

1. Introduction

Indegene believes that all its employees have the right to be treated with respect and dignity. The organisation is committed towards creating a healthy working environment that enables its employees to work without fear, prejudice, gender bias or Sexual Harassment (as hereafter defined).

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the 'Act') and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the 'Rules'), the organisation has framed the following policy (the 'Policy') for prevention of sexual harassment at the workplace.

2. Purpose and Scope Of The Policy

I. Indegene Limited is an equal opportunity company committed towards providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The organisation is also committed to promoting a work environment conducive to the professional growth of its employees and to encouraging equality of opportunity.

II. The organisation will not tolerate any form of Sexual Harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment. This Policy seeks to raise awareness among all Indegene employees about what constitutes Sexual Harassment, the redressal mechanism in place, and the penal consequences (both interim and final) imposed on perpetrators of Sexual Harassment.

3. Policy Description

I. This Policy applies to all categories of employees of the organisation, including permanent employees, permanent management, workers, temporary employees, trainees, consultants, advisers, ad hoc employees, daily wage earners, probationers, apprentices, employees on contract, etc. at their respective workplaces or at the offices of partner organisations during official visits. The Policy applies to all categories of employees as stated above, irrespective of whether they are engaged directly or through an agency or contractor, and whether they are working for remuneration or voluntarily.

II. The Policy shall also apply to all third parties, such as visitors, clients, customers, contractors, service providers, and any other person authorised to be present on the premises/Workplace of Indegene.

III. The Organisation will not tolerate Sexual Harassment if engaged in by partners, suppliers, or any other associates of the organisation. It shall extend to cover Sexual Harassment of women by men, of men by women or between the same sexes. Harassment is unlawful irrespective of who is involved in the behaviour.

4. Definition of Terms

(a) **'Complainant'** means, in relation to a workplace (*as hereinafter defined*), an individual, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent (*as hereinafter defined*);

(b) **'Employees'** means all employees of Indegene as set out in Clause 3(I) of this Policy and includes all categories of employees of the organisation including both part-time and full-time, and not limited to:

- Permanent employees
- Temporary employees
- Trainees, apprentices, probationers and interns
- Contract resources
- Consultants
- Advisers

(c) '**Employer'** means and includes:

- CEO of Indegene
- Any person(s) or board or committee responsible for the formulation and administration of policies that enable management, supervision and control of the Workplace.

(d) **'Internal Committee (IC)'** means the Internal Committee constituted by the Employer for the purpose of dealing with all matters in relation to sexual harassment. The IC is the sole inquiring authority for all complaints of Sexual Harassment at the Workplace and a recommendatory body for disciplinary actions based on the findings of its inquiries. The IC shall be constituted at each of Indegene's premises.

(e) **'Member/s'** means a Member/s of the Internal Committee**;**

(f) **'District Officer'** means an officer notified under Section 5 of the Act

(g) **'Local Committee' or 'LC'** means the Local Complaints Committee constituted under Section 6 of the Act;

(h) **'Respondent'** means a person (Employee) against whom the Complainant has made a complaint of Sexual Harassment;

(i) **'Sexual Harassment'** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

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.

The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment, may amount to sexual harassment at the Workplace:

I. Implied or explicit promise of preferential treatment in the Complainant's employment

II. Implied or explicit threat of detrimental treatment in the Complainant's employment

III. Implied or explicit threat about the Complainant's present or future employment status

IV. Interference with the Complainant's work or creating an intimidating or offensive or hostile work environment for the Complainant

V. Humiliating treatment likely to affect the Complainant's health or safety

(j) **'Workplace'** means and includes the offices of Indegene as well as the premises of other third parties, vendors and associates of Indegene where the employees of Indegene are required to perform work or where the employees of Indegene visit during the course of employment, and also includes transportation provided by Indegene for undertaking any journey, in connection with the business of Indegene.

5. ROLES AND RESPONSIBILITIES

Responsibilities of Individuals:

It is the responsibility of all to respect others' rights and never encourage harassment. All Employees are encouraged to help maintain a work environment free from sexual harassment. It can be done by:

- Refusing to participate in any activity which constitutes harassment.
- Supporting the person to reject unwelcome behaviour
- Acting as a witness if the person being harassed decides to lodge a complaint.

All Employees are encouraged to advise others of unwelcome behaviour. Often, some behaviours are unintentional. While this does not make it acceptable, it does give the person behaving inappropriately the opportunity to modify or stop their offensive behaviour. Additionally, all Employees of Indegene have a personal responsibility to ensure their behaviour does not conflict with this policy.

Responsibilities of Managers:

All managers at Indegene must ensure that no one is subjected to harassment and that 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 victimised in any way.

Employees and Managers are expected to maintain decorum while working from home as well.

6. Constituents of Sexual Harassment

a. Conduct must be unwelcome, unwanted, uninvited, unreasonable, and/or offensive to the Complainant which adversely affects the dignity of the Complainant.
b. Physical contact is not an essential factor for sexual harassment.
c. A person's rejection of or submission to such conduct is used explicitly or implicitly as a basis for a decision which affects that person's job.
d. Conduct that creates an intimidating, hostile or humiliating working environment for the Complainant.
e. The act of sexual harassment must be related to employment or work. Hence, acts committed outside the office, for example, in the cafeteria, on business travel by flight or in a hotel, or at places of visit for official purposes such as client premises, offices, official events, etc., are covered. Additionally, acts committed during Work from Home arrangements that are authorised and/or mandated by the organisation would fall within the ambit of sexual harassment in the workplace. "Work from Home" here refers to a situation wherein Employees work from a remote location that is not the organisation's physical premises, client/vendor premises, or any other location within the ambit of Clause 4(j) of this Policy. Actions that take place in a personal capacity will not be considered workplace concerns unless there is a connection to the workplace, such as the creation of a hostile work environment for the aggrieved person.
f. The Respondent can be whomsoever, provided Indegene has sufficient control over the said person and, without limitation, can be the Complainant's boss, supervisor, subordinate, trainer, colleague, mentor, co-worker, vendor, contractor or agent of the Employer.

7. Exclusion

It is to be noted that this Policy does not apply when the Complainant is performing work outside of the Workplace except as covered under 5(V) of this Policy, or of their own accord and for personal reasons.

8. Third Party Harassment

Third party harassment means sexual harassment perpetrated by visitors, patrons, vendors, independent contractors, auditors, consultants, and others with whom the employees have directly or indirectly come in contact because of Indegene's business relationship with them.

Where Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, Indegene shall take all necessary and reasonable steps to assist the affected employee with support and preventive action.

9. Prevention Of Sexual Harassment

a. Indegene will not tolerate any form of sexual harassment and will strive through education and deterrence to create an environment that is free from sexual harassment.

b. All employees are expected to:

I. Treat others with respect and dignity.

II. Refrain from actions that may offend, embarrass or humiliate others (whether deliberate or unintentional).

III. Let others know they don't approve of disrespectful or harassing behaviour.

IV. Apologise if someone tells them they are offended by their words or actions.

V. Familiarise themselves with this Policy.

10. Zero Tolerance to Retaliation

a. If an employee feels that they are experiencing any retaliation, victimisation, or discrimination in the form of intimidation, pressure to withdraw the complaint, or threats for reporting, testifying, or otherwise participating in the proceedings, they should immediately report the matter by sending an email to the dedicated email ID POSH@Indegene.com. Indegene prohibits retaliation against anyone for raising a complaint or helping to address it. Any retaliation or reprisals are subject to immediate corrective action, up to and including termination of services. Alleged retaliation or reprisals are subject to the same complaint procedures and disciplinary action as complaints of sexual harassment.

b. Inquiry process with templates: It is to be noted that the templates are for guidance only. The Internal Committee may make changes as required, depending on the facts and circumstances of the case.

11. Conflict of Interest Policy

Indegene discourages romantic or sexual relationships between a member of management or other supervisory employee and their staff (an employee who reports directly or indirectly to that person), because such relationships tend to create compromising conflicts of interest at work.

It is therefore in the best interests of all concerned that, if there is such a relationship, the parties involved notify management so that the reporting chain can be adjusted to ensure there is no direct or indirect reporting relationship.

12. Internal Committee

a. The Internal Committee ("**IC**") shall consist of the following members, namely:

I. Presiding Officer who shall be a woman employee at a senior level;

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same Employer or other department or organisation

II. not less than two members from amongst employees who have had experience in social work or have legal knowledge;

III. one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least one-half of the total members of the IC shall be women. The names and contact details of the members of the IC shall be communicated by the Employer to the employees from time to time as applicable.

The names of the Internal Committee are attached as Annexure Z (c).

b. The Presiding Officer and every member of the IC shall hold office for a period not exceeding (3) three years from the date of nomination.

c. IC shall send periodical reports to the Employer constituted under this Policy.

d. The procedure for the IC shall be as contemplated under the provisions of the Act.

A quorum of three Members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer, at least two Members, one of whom shall be a woman.

13. Complaint of Sexual Harassment

a. Any Complainant may make, in writing, a complaint of sexual harassment at the workplace to the Internal Committee if so constituted, or the Local Committee, in case it is not so constituted, within a period of three months from the date of the incident and, in case of a series of incidents, within a period of three months from the date of the last incident:

Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee or the Chairperson or any Member of the Local Committee, as the case may be, shall render all reasonable assistance to the woman for making the complaint in writing:

Provided further that the Internal Committee or, as the case may be, the Local Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

b. In the event the Complainant is unable to make a complaint on account of the Complainant's physical or mental incapacity or death or any other reason which prevents the Complainant from making a complaint. The Complainant's legal heir or any other person as mentioned below may make the complaint on the Complainant's behalf under the Policy:

- In the event the Complainant is unable to make the complaint on account of Complainant's physical incapacity, the complaint may be filed by:
  - Complainant's relative or friend;
  - Complainant's co-worker;
  - an officer of the National Commission for Women or State Women's Commission (in case the Complainant is a woman); or
  - Any person who knows about the incident, with the written consent of the Complainant.
- In the event the Complainant is unable to make the complaint on account of Complainant's mental incapacity, the complaint may be filed by:
  - the Complainant's relative or friend;
  - a special educator;
  - a qualified psychiatrist or psychologist;
  - the guardian or authority under whose care the complainant is receiving treatment or care; or
  - Any person who knows about the incident jointly with the Complainant's relative or friend, or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care the Complainant is receiving treatment or care.
- In the event the Complainant is unable to make the complaint for any other reason, the complaint may be filed by any person who knows about the incident, with the Complainant's written consent.
- In the event of the death of the Complainant, the complaint may be filed by any person who knows about the incident, with the written consent of the Complainant's legal heir.

c. A Complainant may make the written complaint to the IC. No particular form is required; however, the complaint must be in writing and must be signed by the Complainant.

d. A Complainant may file a complaint of sexual harassment in the workplace with the IC at the particular location within a period of three months from the date of the incident.

e. The IC is empowered to extend the time limit beyond three months from the date of the incident, but not exceeding three months thereafter, for reasons to be recorded in writing, if the IC is satisfied that the circumstances were such as to prevent the person from filing the complaint within the said period.

f. The Presiding Officer or any Member of IC may also render reasonable assistance to the Complainant in making any complaint in writing if they cannot make the complaint in writing themselves.

g. Legal heirs or such other persons may also make the complaint if the Complainant is unable to make the complaint on account of their trauma, physical or mental incapacity, death or otherwise.

h. A withdrawal of the complaint made or filed at any stage of the proceedings shall not preclude the IC from proceeding with the investigation of the complaint.

i. If so requested in writing by the Complainant, pending completion of the inquiry, the IC may recommend to the Employer to:

- Transfer the Complainant or the Respondent to any other workplace; or
- Grant leave up to 3 months to the Complainant; or
- Grant such other relief to the Complainant as may be prescribed in the Rules, including restraining the Respondent from reporting on the work performance of the Complainant or writing any confidential report and assigning the same to another officer.

j. The Employer shall implement the recommendations and send a report of their implementation to the IC.

Note: If the Complainant is granted leave in accordance with this Policy, such leave shall be in addition to the leave the Complainant is otherwise entitled to.

14. Conciliation

a. The IC will maintain a register to endorse the complaints received and keep the contents confidential, if so desired, except for use in any internal Inquiry.

b. The IC will hold a meeting with the Complainant within seven days of the receipt of the complaint, but no later than 10 days in any case.

c. At the first meeting, the Members shall hear the complainant and record their allegations. The complainant may also submit any corroborating **material, including documentary evidence, oral or written evidence, etc., to substantiate their** complaint. If the complainant does not wish to depose personally due to embarrassment at narrating the event, a female member for lady Employees involved and a male member for male Employees involved shall meet and record the statement.

d. Thereafter, the person against whom **the complaint is made may be called for a deposition before the IC, and an opportunity will be given to him/her to give an explanation, after which** an enquiry shall be conducted and concluded.

e. In the event the complaint does not fall under the purview of sexual **harassment, or does not constitute an offence of sexual harassment, the same would be dropped after recording the reasons therefor.**

f. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Employer.

g. The Complainant can request conciliation before commencement of an inquiry by the IC. Such conciliation can only be requested by the Complainant.

h. No monetary settlement shall be made as a basis of conciliation.

i. The IC shall then, if applicable, record the settlement so arrived at and forward it to the Employer to take action as specified in the recommendation.

j. The IC shall provide copies of the settlement to the Complainant and the Respondent.

k. Where a settlement is arrived at under conciliation, no further inquiry shall be conducted by the IC.

l. While any conciliation proceeding shall ordinarily be conducted in face-to-face meetings, Clause 15 more fully describes other modes of conducting the same.

Note: In cases where the Complainant feels that it is an instance which could be redressed through conciliation settlement, only in such cases can conciliation be arrived at.

15. Inquiry into Complaint

a. The IC shall follow the prescribed procedures. The IC shall, where the Respondent is an Employee, proceed to inquire into the complaint in accordance with the provisions of the service rules applicable to the Respondent, and where no such rules exist, in such manner as may be prescribed under the Act and corresponding rules thereunder.

b. In case of breach of the terms of the conciliation settlement, an inquiry shall also be held to look into such breach, or the complaint may be forwarded to the police.

Provided further that where both the parties are Employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the IC.

c. The inquiry shall be completed within 90 days from the date of complaint.

d. IC shall forward a copy of the findings to both the parties to make representation against the findings of the IC.

e. For the purpose of inquiring, the Internal Committee or the Local Committee, as the case may be, shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:

I. summoning and enforcing the attendance of any person and examining him on oath;
II. requiring the discovery and production of documents; and
III. any other matter which may be prescribed.

16. Inquiry Procedure

a. The IC shall immediately proceed with the Inquiry and communicate the same to the complainant and Respondent.

b. The Complainant shall submit/send by e-mail a copy of the complaint, supporting documents and list of witnesses to the IC.

c. One copy of the complaint should be sent to the respondent within 7 working days of receipt by the IC.

d. The IC shall prepare and hand over the statement of allegation to the person against whom the complaint is made and allow him/her to submit a written explanation if she/he so desires within 10 days of receipt of the same.

e. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.

f. If the Complainant desires to tender any documents by way of evidence before the IC, she/he shall supply original copies of such documents. Similarly, if the person against whom the complaint is made (Respondent) desires to tender any documents in evidence before the IC, he/she shall supply original copies of such documents. Both shall affix **their signatures (email confirmations or digital signatures are acceptable, as mentioned** in **Clause 15) on the respective documents to certify that they are** original copies.

g. The IC shall use its discretion to call upon the witnesses mentioned by both the Parties, based on the facts and circumstances of the case.

h. The IC shall provide every reasonable opportunity to the complainant and **the Respondent to put forward and defend their respective cases.**

i. IC should follow the principles of natural justice during the course of proceedings.

j. IC may, at its discretion, conduct an ex-parte inquiry if the Complainant or the Respondent fails without sufficient cause to present themselves for 3 consecutive hearings convened by IC. However, such ex-parte order may not be passed without giving notice in writing at least 15 days in advance to the party remaining absent from the proceedings.

k. No legal practitioner is allowed to be brought by the parties to represent them in their case at any stage of the proceedings before the IC.

l. A minimum of 3 members, including the Presiding Officer and the external member, shall be present during the inquiry.

m. While the inquiry/ conciliation proceedings shall ordinarily be conducted face-to-face with the parties and witnesses physically appearing for meetings at the office premises or any other location specified by the IC, in certain circumstances, the IC may allow the parties or witnesses to appear before it through videoconference or telephonic means. In such situations, the following guidelines shall also be observed:

I. Video conference or telephonic proceedings shall be conducted only with the consent of the parties and witnesses involved.

II. The parties or witnesses who are required to depose before the IC shall be given at least 24 hours' notice to ensure they have enough time to set up the infrastructure required for a video conference call.

III. The same standards of confidentiality will bind the IC members/ parties/ witnesses in any inquiry or conciliation, as in face-to-face proceedings. Audio or video recording of proceedings shall not be permitted. The IC member/party/witness appearing through virtual means must ensure that they are alone in the room when taking the call and that no information relating to the proceedings is disclosed to any unauthorised individual.

IV. Parties/witnesses will be sent a copy of the minutes of meetings or other relevant documentation (such as inquiry/findings reports, evidence, etc.) via email.

V. Any communication (including but not limited to consent, confirmations, questions, comments, responses, statements) shall be made through email and/ or digital signatures.

If videoconference or telephonic proceedings are not feasible, the IC may postpone the same until physical meetings can be conducted.

17. Inquiry Report

a. The IC shall provide a report of the findings to the Employer and to both parties within 10 days of the inquiry's completion.

b. The Employer shall act upon the recommendation within 60 days of the receipt of the findings report.

c. If the IC concludes that the allegation against the respondent has not been proved, it shall recommend to the Employer that no action is required to be taken.

d. If the IC concludes that the allegation against the respondent has been proved, it shall recommend to the Employer to:

I. Take action for sexual harassment as misconduct in accordance with the provisions of this policy

II. Deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the Complainant or to her legal heirs, as it may determine, in accordance with the provisions of Section 15 of the Act. In the event the Employer is unable to deduct the same, or in the event of non-payment of the above-mentioned sum by the respondent, the same shall be recovered in a manner as prescribed under Section 13 of the Act.

18. Duties of Employer:

Employer shall:

a. provide a safe working environment at the workplace, including safety from persons coming into contact at the workplace.
b. provide the necessary facilities to the Internal Committee to deal with the complaint and conduct an inquiry.
c. assist in securing the attendance of Respondent and witnesses before the Internal Committee.
d. make available to the Internal Committee such information as it may require, having regard to the complaint being made.
e. aid the aggrieved if they choose to file a complaint in relation to the offence under Bharatiya Nyaya Sanhita (BNS).
f. initiate action under the BNS against the Respondent, or if the aggrieved so desires, where the Respondent is not an employee in the workplace at which the incident of sexual harassment took place.
g. Monitor the timely submission of reports by the Internal Committee.

19. Penalties

a. Consequences of violation of the Policy:

Any person found guilty of violating this Policy, as substantiated by data and facts, will be subject to any of the disciplinary actions listed below, up to and including termination of services, with or without compensation, based on the severity of the case.

- Written apology
- Warning
- Reprimand or censure
- Withholding of promotion
- Withholding of pay rise or increments

- Termination of service
- Undergoing a counselling session
- Carrying out community service
- Monetary compensation

b. The respondent shall be subject to any findings or order of any competent authority, including but not limited to, a Court of Law.

c. *Punishment for false or malicious complaint and false evidence*:

If the complaint is found to be false and malicious, the Complainant shall be liable for appropriate disciplinary action. However, this shall not include complaints in respect of which the Inquiry has remained inconclusive due to circumstances which have rendered the offence difficult to prove and/or such complaints which have been made in good faith. The malicious intent on the part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed before any action is recommended.

Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

Provided further that the malicious intent on the part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

d. *Penalty for publication or making known contents of complaint and inquiry proceedings*:

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 the Act violates confidentiality as provided under Section 16 of the Act, he/she 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. in the Act and rules framed thereunder.

Where any employee who is part of the proceedings of the complaint as a witness, Complainant and/or respondent violates the confidentiality provisions of this Policy, he/she shall be subject to appropriate disciplinary action.

e. Where the Presiding Officer or any Member of the Internal Committee, (a) contravenes the provisions of section 16; or (b) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or (c) he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or (d) has so abused his position as to render his continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the IC and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provisions of this section.

20. Appeal

The Complainant and the Respondent shall have the right to appeal to the Tribunal/Court of Appropriate Jurisdiction within 90 days of the decision of the IC if they are not satisfied with the decision of the IC.

21. Local Committee

a. If the Employer is unable to recover the amount of compensation from the Respondent, the Employer shall forward the Inquiry Report to the District Officer of the Local Committee.

b. If the complaint is against the Employer himself, complaints can be filed before the District Officer of the Local Committee.

22. Filing of Police Complaints

a. If the Complainant so desires, it is the duty of the Employer to assist the Complainant in filing the complaint with the Police.

b. If it is a grave offence, then the Employer is duty-bound to report the matter to the Police.

23. SHe-Box (Sexual Harassment electronic Box)

a. In addition to the internal complaint mechanism set out in this Policy, the Organisation recognises the SHe-Box portal (Sexual Harassment electronic Box), which is a centralised online complaint management system established by the Ministry of Women and Child Development, Government of India, accessible at https://shebox.wcd.gov.in, as an additional channel available to any aggrieved woman for registering a complaint of sexual harassment at the workplace under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

b. The Organisation has registered itself on the SHe-Box portal and shall keep the particulars of its Internal Committee (IC) updated, including the names, designations, and official email addresses of the Presiding Officer and Members, as well as the details of the Nodal Officer appointed for POSH compliance. Any change to the constitution of the IC or to these particulars shall be promptly updated on the portal.

c. A complaint filed through SHe-Box is automatically routed to the Organisation's Internal Committee for inquiry and redressal in accordance with the Act and this Policy. On receipt of such a complaint, the IC shall treat it on par with a complaint received directly and shall proceed in the same manner and within the same timelines prescribed under the Act and this Policy.

d. IC shall acknowledge the complaint on the portal, record the action taken and the status of the inquiry using the unique tracking identifier generated by SHe-Box, and update the outcome so that the complainant and the monitoring authorities can track the progress of the matter. Such updates are in addition to, and do not replace, the direct communication the IC shall maintain with the complainant.

e. The availability of SHe-Box does not dilute, replace or limit the complainant's right to approach the Internal Committee directly under this Policy, nor any other remedy available under law. A complainant may choose either channel, and the confidentiality, non-retaliation and procedural protections set out in this Policy apply equally to complaints received through SHe-Box.

f. The Organisation shall ensure that employees are made aware of the SHe-Box facility through this Policy, awareness programmes and workplace communications, and that the SHe-Box link and the IC/Nodal Officer details remain available and accessible to all employees.

24. Savings

a. The proceedings under this Policy shall be conducted in parallel with the other remedies of law, if such a case arises.

b. The provisions of this Policy shall not restrict the power of the Employer or the Complainant to proceed against the respondent for any other misconduct or to pursue the criminal or civil remedies.

25. Examples of Instances Construed as Sexual Harassment

a. Sexual harassment is classified as below, which includes (but is not limited to) the following:

- Surreptitiously looking or prolonged staring at a person, giving rise to gross discomfort to the person
- Telling sexist and/or smutty jokes or sending these through text, electronic mail or other similar means, causing embarrassment or offence, and the same being carried out after the offender has been advised that they are offensive or embarrassing or, even without such advice, when they are by their nature clearly embarrassing, offensive or vulgar;
- Malicious leering or ogling
- Displaying sexually offensive pictures, materials or graffiti
- Making unwelcoming inquiries or comments about a person’s sex life
- Unwelcome sexual flirtation, advances and propositions
- Making offensive hand or body gestures
- Persistent unwanted attention with sexual overtones
- Unwelcome phone calls with sexual overtones causing discomfort, embarrassment, offence or insult to the receiver or any such verbal or virtual communication with sexual overtones causing discomfort, embarrassment, offence or insult to the receiver
- Unsavoury remarks about a person’s physical characteristics, dressing, attitude, etc.

- Sexual assault
- Malicious and/or unwanted touching or brushing against a victim's body
- Requesting sexual favours in exchange for employment, promotion, local or foreign travels, favourable working conditions or assignments, a passing grade, the granting of honours or scholarship, or the grant of benefits or payment of a stipend or allowance
- Derogatory or degrading remarks or eve-teasing, innuendoes directed toward the members of one sex, or one's sexual orientation or used to describe a person
- Verbal abuse or unwelcome gesture with sexual overtones
- Other analogous cases

26. Annual Report of The IC

a. The IC shall, in each calendar year, prepare an annual report in the prescribed form and submit it to the Employer and the District Officer. The report shall encompass the following:

- Number of complaints received that year
- Number of complaints disposed of during that year
- Number of workshops or awareness programmes conducted
- Number of cases pending for more than 90 days
- Nature of action taken by the Employer
- In the event the IC finds the degree of offence to be covered under the Indian Penal Code, this fact shall be mentioned in its report, and the Employer shall initiate appropriate action to file a police complaint.
- The Company shall also ensure inclusion of a statement in the report by its Board stating that the Company has complied with the provisions relating to the constitution of the IC under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "**Act**").

27. Timelines Under the Act

Sl. No.	ACTION POINT	AUTHORITY/CONCERNED PERSON	TIME LIMIT
1	Complaint	Complaint to be lodged by employee before IC	1) Within the period of 3 months from the date of the incident, or

			2) In case of series of incidents, within the period of 3 months from the date of last incident
2	Initiation of Inquiry Proceedings	By the IC, by sending the copy of complaint to the respondent	Within the period of 7 working days of receipt of the complaint
3	Reply by the respondent along with his list of documents, names and addresses of witnesses	To the IC	Within 10 working days from the day of receipt of the copy of complaint forwarded by the IC
4	Completion of Inquiry proceedings	By IC	Within 90 days from the date of receipt of complaint
5	Submission of Inquiry Report and Findings along with Recommendations by IC	To the Employer	Within 10 days of completion of Inquiry Proceedings by IC
6	Implementation of recommendations made in the inquiry report of the IC	By the Employer	Within 60 days of the receipt of the recommendations made in the inquiry report by the IC
7	Appeal under clause 15.1 of the Policy	By the aggrieved person	Within a period of 90 days of Recommendations by IC

28. Senior Management Approval

As per the IC, it has been reviewed and approved by [Presiding officer – Priyanka Shetty, Core Advisory member- Srishti Kaushik]

29. Amendments

This Policy shall be reviewed periodically by the Employer/ and amendments shall be effected, subject to the approval of the Board, if and when practical difficulties are encountered. However, all such amendments are subject to the Company's applicable laws, rules, and regulations from time to time.

30. Names of Internal Committee Members:

For any issues or complaints under the POSH framework, please get in touch with the Committee at POSH@Indegene.com

Name	Internal Committee Designation	Office Location
Ms. Bina Patil	Presiding Officer	Indegene Office Locations_India
Ms. Priyanka Shetty	Co -Presiding Officer	Indegene Office Locations_India
Mr. Raghavendra Thirtha H R	IC Member	Brunton Road, Bengaluru
Mr. Nishanth Arikala Rao	IC Member	Manyata Tech Park, Bengaluru
Ms. Chithra Prasad Rao	IC Member	Manyata Tech Park, Bengaluru
Mr. Vinodh Premkumar	IC Member	Manyata Tech Park, Bengaluru
Mr. Siddharth Malhotra	IC Member	Gurugram & Noida, NCR
Mr. Nilesh Krishna Gokhale	IC Member	Indiqube Leela Business Park, Mumbai
Mr. Anush Kumar Bulusu	IC Member	Balewadi, Pune
Ms. Ritu Garg	IC Member	Gurugram, NCR
Ms. Jhanvi Dhawan	IC Member	Noida, NCR
Ms. Rachana Dubey	IC Member	Balewadi, Pune
Ms. Amruta Krishna Rao	IC Member	Brunton Road, Bengaluru
Ms. Keerthy Kanakamedala	IC Member	Hitech City, Hyderabad
Mr. Anoop Sonny	IC Member	Hitech City, Hyderabad
Ms. Leena Rajan	IC Member cum Co-Ordinator	Manyata Tech Park, Bengaluru
Ms. Sharanya Venkataraghavan	External Member	Indegene Office Locations_India

31. Annexure Z: Revision History

a. Document Approval Information

Document Owner		Human Resources	
Author(s) Name & Designation(s)	29 April 2026	Srishti Kaushik	Reviewed and approved at the

		Company Secretary & Compliance Officer	meeting of the Board of Directors held on 29th April 2026
Reviewer(s) Name & Designation(s)	29 April 2026	Karthik Kannappan Vice President	
Approver Name & Designation(s)	29 April 2026	Board of Directors	
Final Approver Name & Designation(s)	29 April 2026	Sitara Jagadeesha, Lead- Business Process	

b. Revision Summary

Ver. No.	Ver. Date	Revised By	Description	Filename
19.0	29th October 2026	Srishti Kaushik	Change in members of Internal Committee	Prevention of Sexual Harassment Policy_IND_P_2023-24_V19.0
18.0	03rd October 2026	Srishti Kaushik	Updation of Shebox, revised members and changes in the senior management approval clause.	Prevention of Sexual Harassment Policy_IND_P_2023-24_V18.0
17.0	29th April 2026	Srishti Kaushik	Change in the name of policy from Anti-Sexual Harassment Policy to Prevention of Sexual Harassment Policy	Prevention of Sexual Harassment Policy_IND_P_2023-24_V17.0

Ver. No.	Ver. Date	Revised By	Description	Filename
			Amendment in Names of Internal Committee Members	
16.0	29th January 2026	Srishti Kaushik	Change in IC members Inclusions: Roles and Responsibilities	Anti-Sexual Harassment Policy_IND_P_2023-24_V16.0
15.0	26th September 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V15.0
14.0	17th March 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V14.0
13.0	29th January 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V13.0
12.0	25th March 2024	Srishti Kaushik	Clarification on Conciliation and Inquiry process and inclusion of a statement in the report by its Board complying with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	Anti-Sexual Harassment Policy_IND_P_2023-24_V12.0
11.0	25th January 2024	Srishti Kaushik	Annual review by Board of Directors. No changes incorporated.	Anti-Sexual Harassment Policy_IND_P_2023-24_V11.0

Ver. No.	Ver. Date	Revised By	Description	Filename
10.0	1st Nov 2023	Srishti Kaushik	In page 16, Clause 25. Replaced name of Presiding Officer from Bina Patil to Soundarya Mahalingam, Core Advisory Member from Anand Kiran to Karthik Kannappan Saravanan and deleted the name of Internal Committee Member.	Anti-Sexual Harassment Policy_IND_P_2023-24_V10.0
9.0	9th Dec 2022	Srishti Kaushik	In page 4, Clause 4 (a) Replaced 'man' and 'woman' with 'individual' or 'person'.	Anti-Sexual Harassment Policy_IND_P_2022-23_V9.0
8.0	11th Aug 2021	Rashmi C S	No Changes made to the existing policy	TM_Anti-Sexual Harassment Policy_IND_P_2021-22_V8.0
7.0	07th Jul 2020	Arun Vijayakumar	Updated clause 5 to include acts that are committed during Work from Home arrangements Video conferencing and Telephone included in the Inquiry/ conciliation proceedings	TM_Anti-Sexual Harassment Policy_IND_P_2020-21_V7.0
6.0	27 Nov 2019	Surupa/Yamuna	Policy is reviewed. No changes.	TM_Anti-Sexual Harassment Policy_IND_P_2019-20_V6.0
5.2	19 Sep 2018	Swathi T P	Policy is reviewed. No changes.	TM_Anti-Sexual Harassment Policy_IND_P_2018-19_V5.2

Ver. No.	Ver. Date	Revised By	Description	Filename
5.1	8th Sep 2017	Swathi T P	Prevention of Sexual Harassment is renamed to Anti Sexual Harassment policy Conflict of clause is included	TM_Anti-Sexual Harassment Policy_IND_P_2017-18_V5.1
5.0	22nd May 2017	Swathi T P	Policy and Procedure are separated. ICC renamed to IC as per the new amendment	TM_Prevention on Sexual Harassment_IND_P_2017-18_V5.0
4.0	31st Jan 2017	Soujanya	Policy Formulated and Policy name change	TM_Prevention on Sexual Harassment_IND_PP_2016-17_V4.0
3.2	5th Jan 2016	Vinaya	DMI Template Changed	TM_Unlawful & Sexual Harassment_IND_PP_2016-17_V3.2
3.1	23rd Sep 2014	Vinaya	DMI Template Changed and ICC committee has been added	HR_TM_Unlawful&Sexual_Harssement_PP_Ver3.1
3.0	1st Oct 2011	Vinaya	Committee Details updated	HR_P_3_3_Ver3_ Unlawful_& Sexual_Harrssement
2.0	1st Oct 2010	Bina Patil	Process Updated	HR_P_3_3_Ver2_ Unlawful_& Sexual_Harrssement
1.0	1st Oct 2008	Bina Patil	Policy Formulated	HR_P_3_3_Ver1_ Unlawful_& Sexual_Harrssement