



# Prevention of Sexual Harassment Policy

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## 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 towards promoting a work environment that is conducive to the professional growth of its employees and encourages 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 provide awareness to all employees of Indegene on what actions constitute 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, workmen, 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 is applicable to all categories of employees as stated above, irrespective of whether those employees have been engaged directly or through an agency or a contractor, and whether those employees are working for remuneration or on a voluntary basis.
- II. The Policy shall also be applicable to all third parties such as visitors, clients, customers, contractors, service providers, and any other person authorised to be present within the premises/Workplace of Indegene.
- III. The Organisation will not tolerate Sexual Harassment, if engaged in by partners, or by 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(l) of this Policy and includes all categories of employees of the organisation including both part-time or full time, and not limited to:

- Permanent employees
- Temporary employees
- Trainees, apprentice, 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 enables 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 into all complaints of Sexual Harassment at the Workplace and a recommendatory body for disciplinary actions thereof based on the findings of the 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 it occurs or is 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 the rights of others and to never encourage harassment. All Employees are encouraged to reinforce the maintenance of 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 behavior
- Acting as a witness if the person being harassed decides to lodge a complaint.

All Employees are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately the opportunity to modify or stop their offensive behavior. Additionally, all Employees of Indegene have a personal responsibility to ensure that their behavior is not contrary to this policy.

### Responsibilities of Managers:

All managers at Indegene must ensure that nobody is subject 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.

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

## 6. Constituents of Sexual Harassment

- a. Conduct must be unwelcomed, 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. 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 in a flight or hotel, place of visit for official purpose such as client premises, offices, official events, etc. are covered. Additionally, acts that are committed during Work from Home arrangements that are authorized and/ or mandated by the organization would fall within the ambit of sexual harassment at the workplace. "Work from Home" here refers to a situation wherein Employees are working from a remote location which is not the organization's physical premises, client/ vendor premises, or any other location within the ambit of Clause 4(j) of this Policy. Actions which take place in personal capacity will not be considered workplace concerns unless there is connection with the workplace by way of 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, sub-ordinate, 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 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 the Sexual Harassment at the Workplace occurs as a result of an act or omission by any third party, Indegene shall take all steps necessary and reasonable to assist the affected employee in terms of 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 he/she is experiencing any kind of retaliation, victimisation or discrimination in the nature of intimidation, pressure to withdraw the complaint or threats for reporting, testifying or otherwise participating in the proceedings, he/she should immediately report the matter by sending an email to the dedicated email id [POSH@Indegene.com](mailto:POSH@Indegene.com). Indegene prohibits retaliation against anyone for raising a complaint or helping in addressing the complaint. 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 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 his or her 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 interest of all concerned that if there is such a relationship, the involved parties notify management so the reporting chain can be changed to ensure no direct or indirect reporting relationship.

## 12. Internal Committee

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- 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 as regards 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

- 13.1. Any Complainant may make, in writing, a complaint of sexual harassment at 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 incident and in case of a series of incidents, within a period of three months from the date of 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.

**13.2.** 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, then 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 has knowledge of 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 has knowledge of 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 has knowledge of 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 has knowledge of the incident, with the written consent of the Complainant's legal heir.

**13.3.** 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.

- 13.4.** A Complainant may make a complaint of sexual harassment at workplace to the IC of the particular location within a period of three months from the date of the incident.
- 13.5.** The IC is empowered to extend the time limit beyond three months from the date of incident, but not exceeding three months thereafter, for reasons to be recorded in writing if the IC is satisfied that the circumstances were such which prevented the person from filing the complaint within the said period.
- 13.6.** The Presiding Officer or any Member of IC may also render reasonable assistance to the Complainant for making any complaint in writing, if he/she cannot make the complaint in writing themselves.
- 13.7.** Legal heirs or such other persons may also make the complaint if the Complainant is unable to make the complaint on account of his/her trauma, physical or mental incapacity or death or otherwise.
- 13.8.** 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.
- 13.9.** If so, requested in writing, by the Complainant, pending completion of the inquiry, the IC may recommend 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 maybe prescribed in the Rules, including restraining the respondent from reporting on the work performance of the Complainant or writing any confidential report and assign the same to another officer.
- 13.10.** The Employer shall implement such recommendations and send a report of such implementation to the IC.

*Note: In the event that the Complainant is granted leave in accordance with this Policy, such leaves shall be in addition to the leave the Complainant is otherwise entitled to.*

## **14. Conciliation**

- 14.1.** The IC will maintain a register to endorse the complaints received and keep the contents confidential, if it is so desired, except to use the same for any internal Inquiry.
- 14.2.** 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.
- 14.3.** At the first meeting, the Members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the complainant does not wish to depose

personally due to embarrassment of narration of event, a female member for lady Employees involved and a male member for male Employees, involved shall meet and record the statement.

- 14.4.** Thereafter, the person against whom 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, where after, an enquiry shall be conducted and concluded.
- 14.5.** In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
- 14.6.** In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Employer
- 14.7.** The Complainant can request for conciliation before commencement of an inquiry by the IC. Such conciliation can only be requested by the Complainant.
- 14.8.** No monetary settlement shall be made as a basis of conciliation.
- 14.9.** The IC shall then record the settlement so arrived, if applicable, and forward the same to the Employer to take action as specified in the recommendation.
- 14.10.** The IC shall provide the copies of the settlement to the Complainant and the Respondent.
- 14.11.** Where a settlement is arrived under conciliation, no further inquiry shall be conducted by the IC.
- 14.12.** 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, conciliation can be arrived at.*

## **15. Inquiry into Complaint**

- 15.1.** The IC shall follow the prescribed procedures. The IC shall, where the Respondent is an Employee, proceed to make inquiry 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 maybe prescribed under the Act and corresponding rules thereunder.
- 15.2.** In case of breach of the terms of conciliation settlement, an inquiry shall also be held to look into such breach or may forward the complaint 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.

- 15.3.** The inquiry shall be completed within 90 days from the date of complaint.
- 15.4.** IC shall forward the copy of findings to both the parties to make representation against findings of the IC.
- 15.5.** For the purpose of making an inquiry, the Internal Committee or the Local Committee, as the case may be, shall have the same powers as are vested in a civil court 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**

- 16.1.** The IC shall immediately proceed with the Inquiry and communicate the same to the complainant and Respondent.
- 16.2.** The Complainant shall submit/send by e-mail copy of the complaint, supporting documents and list of witnesses to the IC.
- 16.3.** One copy of the complaint should be sent to respondent after receipt of the complaint within 7 working days by the IC.
- 16.4.** The IC shall prepare and hand over the statement of allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 10 days of receipt of the same.
- 16.5.** The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 16.6.** 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 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 his / her signature (email confirmations, digital signatures are acceptable as mentioned In Clause. 15) on the respective documents to certify these to be original copies.
- 16.7.** 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
- 16.8.** The IC shall provide every reasonable opportunity to the complainant and to the Respondent, for putting forward and defending their respective case.



- 16.9.** IC should follow the principles of natural justice during the course of proceedings.
- 16.10.** IC may, at its discretion, conduct the 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 a notice in writing at least 15 days in advance to the party remaining absent from the proceedings.
- 16.11.** 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.
- 16.12.** Minimum of 3 members including Presiding Officer and the external member shall be present while conducting the inquiry.
- 16.13.** 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 adequate notice of 24 hours to ensure that they have enough time to set up the infrastructure required for taking a video-conference call.
  - III. The IC members/ parties/ witnesses to any inquiry or conciliation will be bound by the same standards of confidentiality as in the case of 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 part of information relating to the proceedings is made known to any unauthorized 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 and all communication (including but not limited to consent, confirmations, questions, comments, responses, statements) shall be made through email and/ or digital signatures.

In the event that 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 report of the findings to the Employer and both the parties within a period of 10 days from the date of completion of inquiry.
- b. The Employer shall act upon the recommendation within 60 days of the receipt of the findings report.

- c. If the IC arrives at the conclusion 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 arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Employer to:
  - I. Take action for sexual harassment as a 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 safe working environment at the workplace including safety from persons coming into contact at the workplace.
- b. provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- c. assist in securing the attendance of Respondent and witnesses before the Internal Committee.
- d. make available such information to the Internal Committee 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 below mentioned disciplinary action, leading up to and including termination of services with/or without compensation based on severity of case.

- Written apology
- Warning
- Reprimand or censure

- With-holding of promotion
  - With-holding of pay rise or increments
  - Terminating 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 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, 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. 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.

## 24. 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 offense, 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, offense or insult to the receiver or any such verbal or virtual communication with sexual overtones causing discomfort, embarrassment, offense 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 for 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

## 25. Annual Report of The IC

- a. The IC shall in each calendar year prepare an annual report in the prescribed form and submit the same 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 coverable under the Indian Penal Code then this fact shall be mentioned in its report and appropriate action shall be initiated by the Employer for making 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").

## 26. 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

## 27. Senior Management Approval

As per the IC, it has been reviewed and approved by [Presiding officer – Soundarya Mahalingam, Core Advisory member- Karthik Kannappan Saravanan]

## 28. Amendments

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

## 29. Names of Internal Committee Members:

For any issues or complaints under the POSH framework, please contact the Committee at [POSH@indegene.com](mailto:POSH@indegene.com)

Name	Designation	Office Location
Ms. Soundarya Mahalingam (Presiding Officer)	Vice President - People Practices & Systems	All Indegene Office Locations
Mr. Karthik Kannappan Saravanan (Core Advisory Member)	Vice President - Legal	All Indegene Office Locations
Mr. Amit Gupta	Vice President - Corporate Strategy	Brunton Road, Bengaluru
Ms. Sonica Sachdeva Batra	Associate Vice President - Enterprise Medical	Hitech City, Hyderabad
Ms. Chithra Prasad Rao	Associate Vice President - Business Excellence	Manyata Tech Park, Bengaluru
Ms. Neha Singh	Head of Marketing	Brunton Road, Bengaluru
Mr. Nishant Khanna	Senior Director - Creative Digital and Business Solutions	Manyata Tech Park, Bengaluru

Mr. Vinodh Premkumar	Senior Director - Testing Solutions	Manyata Tech Park, Bengaluru
Mr. Prasad Chandrahas Nayak	Senior Director - Safety Operations	Indiqube Leela Business Park, Mumbai
Ms. Priyanka Shetty (Alternate Presiding Officer)	Senior Director - Human Resources	Indiqube Leela Business Park, Mumbai
Mr. Siddharth Malhotra	Senior Director - Data & Analytics	Gurugram, NCR
Ms. Aparajita Konamaneni	Director- Legal	Hitech City, Hyderabad
Mr. Anush Kumar Bulusu	Director - Product Management	Balewadi, Pune
Ms. Ritu Garg	Director- Campaign Operations	Gurugram, NCR
Ms. Jhanvi Dhawan	Director - Digital Transformation	Noida, NCR
Ms. Rachana Dubey	Senior Manager - Business Solutions	Balewadi, Pune
Ms. Leena Rajan	Senior Manager - Talent Management	Manyata Tech Park, Bengaluru
Ms. Krithika Balu	External Member	All Indegene Office Locations

## 30. Annexure Z: Revision History

### 30.1. Document Approval Information

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

<b>Reviewer(s) Name &amp; Designation(s)</b>	29 April 2026	Karthik Kannappan Vice President	meeting of the Board of Directors held on 29 <sup>th</sup> April 2026
<b>Approver Name &amp; Designation(s)</b>	29 April 2026	Board of Directors	
<b>Final Approver Name &amp; Designation(s)</b>	29 April 2026	Sitara Jagadeesha, Lead- Business Process	

### 30.2. Revision Summary

Ver. No.	Ver. Date	Revised By	Description	Filename
17.0	29 <sup>th</sup> April 2026	Srishti Kaushik	Change in the name of policy from Anti-Sexual Harassment Policy to Prevention of Sexual Harassment Policy  Amendment in Names of Internal Committee Members	Prevention of Sexual Harassment Policy_IND_P_2023-24_V17.0
16.0	29 <sup>th</sup> January 2026	Srishti Kaushik	Change in IC members  Inclusions: Roles and Responsibilities	Anti-Sexual Harassment Policy_IND_P_2023-24_V16.0
15.0	26 <sup>th</sup> September 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V15.0

Ver. No.	Ver. Date	Revised By	Description	Filename
14.0	17 <sup>th</sup> March 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V14.0
13.0	29 <sup>th</sup> January 2025	Srishti Kaushik	Change in IC members	Anti-Sexual Harassment Policy_IND_P_2023-24_V13.0
12.0	25 <sup>th</sup> 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	25 <sup>th</sup> January 2024	Srishti Kaushik	Annual review by Board of Directors. No changes incorporated.	Anti-Sexual Harassment Policy_IND_P_2023-24_V11.0
10.0	1 <sup>st</sup> 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	9 <sup>th</sup> Dec 2022	Srishti Kaushik	In page 4, Clause 4 (a) Replaced 'man' and 'woman' with 'individual' or 'person'.	Anti-Sexual Harassment

Ver. No.	Ver. Date	Revised By	Description	Filename
				Policy_IND_P_2022-23_V9.0
8.0	11 <sup>th</sup> 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	07 <sup>th</sup> 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
5.1	8 <sup>th</sup> 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	22 <sup>nd</sup> 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

Ver. No.	Ver. Date	Revised By	Description	Filename
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	23 <sup>rd</sup> Sep 2014	Vinaya	DMI Template Changed and ICC committee has been added	HR_TM_Unlawful&Sexual_Harssement_PP_Ver3.1
3.0	1 <sup>st</sup> Oct 2011	Vinaya	Committee Details updated	HR_P_3_3_Ver3_Unlawful_& Sexual_Harrssement
2.0	1 <sup>st</sup> Oct 2010	Bina Patil	Process Updated	HR_P_3_3_Ver2_Unlawful_& Sexual_Harrssement
1.0	1 <sup>st</sup> Oct 2008	Bina Patil	Policy Formulated	HR_P_3_3_Ver1_Unlawful_& Sexual_Harrssement