POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

HAB
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1. PREAMBLE

HAB Pharmaceuticals & Research Limited ("the Company") is committed to fostering a work environment that is safe, respectful, inclusive, and free from sexual harassment. Sexual harassment at the workplace is a serious violation of individual dignity and human rights and will not be tolerated under any circumstances.

This Policy has been framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder ("the Act") and complements the Company's broader Code of Conduct and ethical standards.

2. OBJECTIVES

This Policy aims to:

- Prevent and prohibit sexual harassment in any form at the workplace;
- Provide a clear framework for reporting, investigating, and resolving complaints;
- Raise awareness and educate employees about their rights and responsibilities regarding sexual harassment;
- Ensure timely and effective resolution of complaints while maintaining confidentiality and fairness.

3. SCOPE AND APPLICABILITY

This Policy applies to:

- All employees of the Company, whether permanent, temporary, contractual, trainees, or interns;
- All women or individuals identifying as women, and others in case of complaints handled under the Company's general grievance procedures;
- All locations of the Company, including offices, field sites, or any place visited in connection with employment;
- Third parties, such as consultants, vendors, or service providers, while engaged with the Company.

4. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any unwelcome act or behaviour of a sexual nature, whether direct or implied, including but not limited to:

- Physical contact and advances;
- Requests or demands for sexual favours;
- Making sexually explicit or suggestive remarks;
- Displaying or sharing pornography;
- Any other verbal, non-verbal, or physical conduct of a sexual nature.

Circumstances that may constitute sexual harassment include, among others:

- Implied or explicit promises of preferential treatment or threats of detrimental treatment;
- Interference with work performance or creation of a hostile or intimidating work environment;
- Humiliating or offensive behaviour affecting the health, safety, or dignity of the employee.

Sexual harassment is determined by its effect on the complainant and not the intent of the respondent.

5. INTERNAL COMMITTEE (IC)

The Company has constituted an Internal Committee (IC) in accordance with the Act for workplaces with 4 or more employees.

Composition of IC:

- Presiding Officer: Senior woman employee of the Company;
- Members: At least two employees, preferably with experience or interest in women's issues, legal, or social work;
- External Member: Representative from an NGO or legal professional with expertise in gender issues.

The names and contact details of IC members will be displayed prominently at all Company locations.

6. COMPLAINT MECHANISM

6.1 Lodging a Complaint

- An aggrieved person may submit a written or electronic complaint to any IC member within 3 months from the date of the incident.
- The IC may extend the timeline by another 3 months in cases where sufficient cause is demonstrated.

6.2 Complaint Contents

Complaints should include:

- Name, designation, and contact details of the complainant;
- Name and designation of the respondent;
- Detailed description of the incident(s), including dates, times, locations, and witnesses;
- Any supporting documents or evidence.

7. INQUIRY PROCESS

- The IC shall investigate complaints in accordance with the principles of natural justice.
- The respondent will be given an opportunity to respond to allegations.
- The IC shall complete the inquiry within 90 days and submit findings and recommendations to the employer within 10 days.
- The employer shall act on the recommendations within 60 days of receipt.

8. INTERIM RELIEF

During an inquiry, the IC may recommend interim measures to ensure the safety and well-being of the complainant, such as:

- Temporary transfer of either party;
- Grant of leave up to 3 months to the complainant;
- Restriction of contact between the complainant and respondent.

9. PENALTIES AND ACTIONS

Based on IC findings, the Company may take disciplinary action including:

- Written apology or warning;
- Reprimand or censure;
- Withholding of promotion or increment;
- Termination of employment;
- Deduction from salary as compensation to the aggrieved.

If a complaint is found to be false or malicious, appropriate action may also be taken against the complainant.

10. CONFIDENTIALITY

All details of the complaint, investigation, and recommendations shall remain strictly confidential. Breach of confidentiality by any party may result in disciplinary action.

11. AWARENESS AND TRAINING

The Company shall:

- Conduct regular awareness and sensitization programs for employees;
- Provide training to IC members on handling complaints and conducting fair inquiries;
- Display this Policy and IC contact details prominently at all workplaces.

12. ANNUAL REPORTING

The IC shall prepare an annual report containing:

- Number of complaints received and resolved;
- Actions taken;
- Training programs conducted.

The report shall be submitted to the employer and the District Officer as mandated under the Act.

13. POLICY REVIEW AND AMENDMENT

This Policy shall be reviewed periodically by the Board of Directors and may be amended in light of legal developments, organizational requirements, or feedback from employees.

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