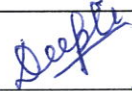
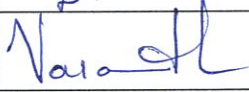


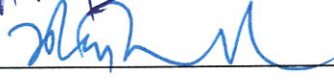


Prevention of Sexual harassment (POSH)

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Prevention of Sexual Harassment (POSH)

Aure Life Sciences shall hereunder be referred to as the “Company” or “Employer” as the case may be.

Introduction:

Sexual Harassment is defined as an unwelcome verbal, visual or physical conduct of a sexual nature that is severe or pervasive and affects working conditions or creates a hostile work environment.

Such conduct may endanger the victim’s job, negatively affect the victim’s job performance, or undermine the victim’s personal dignity. It may manifest itself physically or psychologically. Its milder and subtle forms may imply verbal innuendo, inappropriate affectionate gestures or propositions for dates and sexual favors. However, it may also assume blatant and ugly forms like leering, physical grabbing and sexual assault or sexual molestation. To fit in the concept of sexual harassment the relevant conduct must be unwelcome.

Definitions:

Employee: means a person employed at a workplace for any work on regular, temporary, adhoc or daily wage basis, either directly or through an agent, including a contractor, with or, without

the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Sexual harassment includes any unwelcome sexually determined behavior (whether direct or by implication) such as physical contact or advances, a demand or request for sexual favors, sexually colored remarks, showing pornography. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or use of words which hurts a woman's dignity, feelings or in any manner or causing a reasonable apprehension with regard to her position in employment.

For Harassment of women at workplace additional safeguards under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (the "Act") are placed which form an integral part of this policy.

District Officer: means an officer notified under section 5; i.e., The Government may notify a District Magistrate or Additional District Magistrate or the Collector or Deputy Collector as a District Officer for every District to exercise powers or discharge functions under this Act.

Aggrieved woman: means in relation to a workplace, an woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

1. Complaint mechanisms under the 2013 Act

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (the "Act") contemplates the constitution of Internal Complaints Committee ("ICC") (Sec. 4) at the work place.

Complaint mechanisms at Aurore Life Sciences (ALS)

ALS has its own central Internal Complaints Committee (ALS) which has 5 trained members in it. In addition to that every unit has its own ICC team. The complaints will first be recorded at the Business Unit (BU) level & will immediately involve the central ICC team.

2. Constitution of ICC

- The ICC shall consist of the following members to be nominated by the employer, namely:
 - A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees. In case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices/workplace or administrative units of the same employer.
 - Not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
 - One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
 - At least one-half of the total Members so nominated shall be women to deliberate and decide on all matters relating to interests and protection of women. In all other cases and matters, the representation of the Internal committee will be based on the proportion of male and female employees.
 - The Presiding Officer and every member of the ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the ICC, by the employer as may be prescribed.

3. Steps involved in the process

- **Step I**

A complaint is to be made in writing by an aggrieved woman within 3 months of the date of the incident. The time limit may be extended for a further period of 3 months if, on account of certain circumstances, the employee was prevented from filing the complaint. If the aggrieved employee is unable to make a complaint on account of her physical or mental incapacity or death, the legal heirs of employee may do so.

- **Step II**

Upon receipt of the complaint, the ICC must proceed to make an inquiry in accordance with the service rules applicable to the respondent or in their absence, in accordance with rules framed under the Act.

- **Step III**

The inquiry must be completed within a period of 90 days.

- **Step IV**

Where the ICC finds that the allegations against the respondent are proven, it must submit a report to the employer to: (i) take action for sexual harassment as a misconduct in accordance with the provisions of the applicable service rules or where no service rules exist, in accordance with rules framed under the Act; (ii) to deduct from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to their legal heirs. ICC shall submit its recommendations to the Employer.

- **Step V**

The employer must act on these recommendations within 60 days.

4. Scope for conciliation & settlement

- Before initiating an inquiry, the ICC may, at the request of the aggrieved employee, take steps to arrive at a settlement between the parties. However, no monetary settlement can be made as the basis of such conciliation (Sec. 10(1))
 - Where a settlement has been arrived, the ICC, shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation.
 - The ICC shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.
- Where a settlement is arrived, no further inquiry shall be conducted by the ICC.

5. Inquiry into the complaint

- Where the aggrieved woman informs the ICC that any term or condition of the settlement arrived during conciliation has not been complied by the respondent, the ICC shall proceed to make an inquiry into the complaint.
- Where 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 Committee.
- For the purpose of making an inquiry the ICC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters namely :

- Summoning and enforcing the attendance of any person and examining him on oath; requiring the discovery and production of documents; and
- any other matter which may be prescribed
- The inquiry shall be completed within a period of ninety days.

6. Action during pendency of an inquiry

- During the pendency of an inquiry, on a written request made by the aggrieved woman, the ICC may recommend to the employer to –
 - transfer the aggrieved woman or the respondent to any other workplace or
 - in case of women: grant leave to the aggrieved woman up to a period of three months; or
grant such other relief to the aggrieved woman as may be prescribed. The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.
 - On the recommendation of the ICC, the employer shall implement the recommendations and send the report of such implementation to the ICC.

7. Inquiry report

- On the completion of an inquiry, the ICC shall provide a report of its findings to the employer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
- If the ICC 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 in the matter.
- Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer –
 - To take action for sexual harassment as a misconduct with the provisions of the service rules applicable to the respondent or where no such service rules have been made, in such manner as may be prescribed
 - To 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 aggrieved woman or to her legal heirs as it may determine

In case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman

In case respondent fails to pay the sum, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

8. The employer or the District Officer shall act upon the recommendation within sixty days of its receipt by him.

9. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

In case the ICC is of the view that a malicious or false complaint has been made, it may recommend that a penalty be levied on the complainant in accordance with the applicable service rules (Section – 14). However, an inquiry must be also made. Mere inability to substantiate a complaint will not attract action under this provision.

10.. DETERMINATION OF COMPENSATION

101 For the purpose of determining the sums to be paid to the aggrieved woman, the ICC, shall have regard to ---

10.2 the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;

10.3 the loss in the career opportunity due to the incident of sexual harassment;

10.4 medical expenses incurred by the victim for physical or psychiatric treatment;

10.5 the income and financial status of the respondent;

10.6 feasibility of such payment in lump sum or in installments.

11. PROHIBITION OF PUBLICATION

11.1 Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

11.2 Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

RESPONSIBILITIES OF HR

12.1 To provide a safe working environment at the workplace that shall include safety from the persons coming into contact at the workplace.

12.2 To display at any conspicuous place in the workplace, the penal consequences, of sexual harassments.

12.3 To organize workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programs for the members of the ICC.

12.4 To provide necessary facilities to the ICC, for dealing with the complaint and conducting an inquiry.

12.5 To assist in securing the attendance of respondent and-witnesses before the ICC.

12.6 To provide assistance to the woman if she so chooses to file a complaint in relation to the offence.

12.7 To treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.

12.8 To monitor the timely submission of reports by the ICC.