

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Iberia Pharmaceuticals India Limited

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1. PREAMBLE AND OBJECTIVE

Iberia Pharmaceuticals India Limited (the “Company”) is committed to providing a safe, respectful and dignified working environment for all its employees, free from any form of discrimination or harassment, including sexual harassment. The Company recognises that every individual has the right to work in an environment that promotes equal opportunity and human dignity.

This Policy on Prevention of Sexual Harassment at Workplace (“Policy”) has been formulated in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”) and the rules made thereunder. The Company operates a zero-tolerance policy towards any form of sexual harassment. All allegations shall be treated seriously, investigated promptly and dealt with appropriately. Any person found to have engaged in sexual harassment shall be subject to disciplinary action, up to and including termination of employment. All complaints shall be handled with sensitivity, fairness and in strict confidence, and no person shall be victimised for raising a complaint in good faith.

2. SCOPE

This Policy applies to all categories of persons engaged with or associated with the Company, including permanent employees (management and workmen), temporary staff, trainees, contractual employees, interns, and any other individuals working at the Company’s premises or at client sites. The Policy also extends to conduct by or against clients, suppliers, vendors, and other business associates of the Company.

For the purposes of this Policy, “workplace” shall include:

- all offices and premises where the business of the Company is carried out;
- all Company-related activities performed at locations other than the Company’s premises; and
- any social, business or other event or function where conduct or comments may have an adverse bearing on workplace relationships or the work environment.

3. DEFINITIONS

- a) **“Aggrieved Person”** means any woman employee, whether permanent, temporary, contractual or otherwise, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- b) **“Complaint”** means a voiced objection or the allegation by the Complainant or any other person (whether in writing or oral) of sexual harassment by the Respondent that forms the basis of an investigation under this policy. “Complainant” means the person (s) against whom an incident

- (s) of sexual harassment has been allegedly committed.
- c) **“Complainant”** means the Aggrieved Person or the person duly authorised to make a complaint on her behalf in accordance with this Policy.
 - d) **“Respondent”** means the person against whom a complaint of sexual harassment has been made by the Complainant.
 - e) **“Internal Complaints Committee” or “ICC”** means the Internal Complaints Committee constituted by the Company under this Policy in accordance with the POSH Act.
 - f) **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication: (i) physical contact or advances; (ii) a demand or request for sexual favours; (iii) making sexually coloured remarks; (iv) showing pornography; or (v) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

All other words and expressions used in this Policy and not defined herein shall have the meanings assigned to them under the POSH Act and the rules made thereunder, or under any other applicable law.

4. FORMS OF SEXUAL HARASSMENT

Sexual harassment may be physical, verbal or non-verbal in nature. The following are illustrative examples of conduct that may constitute sexual harassment:

(A) Physical Conduct:

- unwelcome physical contact such as patting, pinching, stroking, kissing, hugging, fondling or any inappropriate touching;
- physical violence, including sexual assault; and
- use of job-related threats or rewards to solicit sexual favours.

(B) Verbal Conduct:

- comments on a person’s appearance, age or personal life;
- sexually explicit comments, stories or jokes;
- unwanted and repeated social invitations or advances;
- insults or condescending remarks based on gender; and
- sending sexually explicit messages, whether by phone, email or any other medium.

(C) Non-Verbal Conduct:

- display of sexually explicit or suggestive material;
- sexually suggestive gestures; and
- leering or whistling directed at a person in a sexual manner.

Anyone can be a aggrieved person, who could face sexual harassment, regardless of their gender and of the gender of the harasser. *Iberia Pharmaceuticals India Limited* recognizes that sexual harassment may also occur between people of the same gender. What matters is that sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Iberia Pharmaceuticals India Limited recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of *Iberia Pharmaceuticals India Limited*, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

Any act of sexual harassment is prohibited whether it takes place within *Iberia Pharmaceuticals India Limited* premises or outside, including at social events of the Company business trips, training sessions or conferences sponsored by the Company.

5. INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company shall constitute an Internal Complaints Committee (“ICC”) to receive, inquire into and make recommendations on complaints of sexual harassment. The ICC shall be constituted by the Chairman and Managing Director and shall comprise the following members:

- a Presiding Officer, who shall be a woman employed at a senior level at the workplace from amongst the employees. Where no senior-level woman employee is available at a particular office or administrative unit, the Presiding Officer shall be nominated from any other workplace of the same employer or from another department or organisation;
- not less than two members from amongst employees, preferably persons committed to the cause of women or having experience in social work or legal knowledge; and
- one member from a non-governmental organisation or association committed to the cause of women, or a person familiar with issues relating to sexual harassment.

At least one-half of the total members of the ICC shall be women.

The ICC shall operate in accordance with the following guidelines:

- Every complaint received shall be forwarded to the ICC for inquiry and investigation.

- ICC members shall be provided with appropriate training, on a need basis, to handle complaints with the requisite sensitivity, care and competence.
- The ICC shall meet as and when any instance of alleged violation of this Policy is referred to it, and in any case, at least once in a year.
- The ICC shall prepare an annual report of its functioning, including the number of cases filed and their disposal status, and submit the same to the Board.
- The Presiding Officer and members of the ICC shall hold their positions for a term of up to three years from the date of their nomination. Upon expiry of such term, the Company may renominate the existing members or appoint new members in their place.

6. COMPLAINTS REDRESSAL MECHANISM

(A) Filing of Complaint:

- An Aggrieved Person may submit a written complaint of sexual harassment to the ICC within three months from the date of the incident, or within three months from the date of the last incident in a series of incidents. The ICC may, for reasons recorded in writing, extend this period by a further period not exceeding three months, if it is satisfied that circumstances prevented timely filing.
- Where the Aggrieved Person is unable to submit a written complaint, the Presiding Officer or any member of the ICC shall provide all reasonable assistance to enable her to do so.
- Where the Aggrieved Person is unable to make a complaint on account of physical or mental incapacity, death or otherwise, the complaint may be made by her legal heir, a co-worker, an officer of the National or State Women's Commission, or any other person having knowledge of the incident, with the written consent of the Aggrieved Person.

(B) Inquiry Process:

- The ICC shall conduct the inquiry in accordance with the principles of natural justice and shall afford reasonable opportunities to both parties to present their case.
- Upon receipt of a complaint, the ICC shall provide a copy of the complaint along with supporting documents to the Respondent within 7 working days.
- The Respondent shall file a written reply, along with a list of documents and names and addresses of witnesses, within 10 working days from the date of receipt of the documents from the ICC.
- For the purposes of conducting the inquiry, the ICC shall have the powers of a civil court in respect of: (i) summoning and examining persons under oath; (ii) requiring discovery and production of documents; and (iii) any other prescribed matter.
- During the inquiry, both parties shall refrain from any form of threat, intimidation or tampering with witnesses. The ICC may, on written request of the Complainant, recommend appropriate interim relief measures, including transfer of the Complainant or the Respondent to another

location, or grant of additional leave to the Complainant for a period of up to three months with full salary.

- The ICC shall ensure strict confidentiality throughout the inquiry process and shall take all necessary steps to protect the identity of the Complainant, the Respondent and any witnesses from public disclosure.
- If the Respondent or the Complainant remains absent for three consecutive hearings without sufficient cause, the ICC may terminate the inquiry or pass an ex-parte decision, provided that a written notice of at least 15 days is given to the concerned party prior to such action.
- The ICC shall complete the inquiry within 90 days from the date of receipt of the complaint. The quorum for ICC meetings shall be three members, including the Presiding Officer.

(C) Conciliation:

Prior to initiating a formal inquiry, the ICC may, at the request of the Aggrieved Person, explore the possibility of settling the matter through conciliation. However, no monetary settlement shall be used as a basis for conciliation. Where a settlement is reached, the ICC shall record the terms of settlement and forward the same to the employer for necessary action. A copy shall be provided to both parties. No further inquiry shall be conducted once a settlement is arrived at.

7. INFORMAL COMPLAINTS MECHANISM

Where the Aggrieved Person wishes to resolve the matter informally, the ICC shall:

- provide the Respondent an opportunity to respond to the complaint;
- ensure that the Respondent is made aware of the complaints mechanism under this Policy;
- facilitate a discussion between the parties to arrive at an informal resolution acceptable to the Complainant, or refer the matter to an internal mediator for resolution;
- maintain a confidential record of the proceedings and outcome; and
- follow up after the conclusion of the informal process to confirm that the conduct has ceased. The entire informal resolution process shall be concluded within 7 days of the complaint being made.

8. FORMAL COMPLAINTS MECHANISM

Where the Aggrieved Person opts for a formal inquiry, or where the informal mechanism has not yielded a satisfactory outcome, the formal complaints mechanism shall be invoked. The matter shall be referred by the designated officer to a senior Human Resources manager, who may conduct the investigation personally or refer it to an internal investigator in accordance with this Policy. The investigator shall:

- interview the Aggrieved Person and the Respondent separately;
- interview other relevant witnesses separately;

- determine, on the basis of evidence gathered, whether the act(s) of sexual harassment took place;
- prepare a detailed report of the investigation, findings and recommendations;
- where harassment is established, determine appropriate remedies for the Aggrieved Person, in consultation with her, which may include an apology, change in working arrangements, reinstatement, training for the Respondent, or disciplinary action;
- ensure that the recommendations are implemented and that the conduct has ceased;
- maintain a comprehensive record of all actions taken; and
- ensure confidentiality of all records and complete the investigation within 7 days of the complaint being made.

9. EXTERNAL COMPLAINTS MECHANISM

An Aggrieved Person who has been subjected to sexual harassment may also seek redressal through external forums, including the Local Complaints Committee constituted by the appropriate Government, labour courts, or judicial courts, as may be applicable.

10. SANCTIONS AND DISCIPLINARY MEASURES

Any person found to have engaged in sexual harassment shall be liable to disciplinary action, which may include one or more of the following, depending upon the gravity and circumstances of the conduct:

- written warning or reprimand;
- adverse performance evaluation;
- reduction in wages or withholding of increment;
- transfer;
- demotion;
- suspension; or
- termination of employment.

Sanctions shall be proportionate to the severity of the conduct. Serious acts of harassment, including physical violence or sexual assault, shall ordinarily result in immediate termination of employment.

11. FALSE ALLEGATIONS

All complaints of sexual harassment shall be treated with utmost seriousness. However, the Company maintains a zero-tolerance approach towards malicious or false allegations. Where, upon completion of the inquiry, the ICC concludes that the complaint was made with a malicious intent and was knowingly false, appropriate action may be recommended against the Complainant.

A mere inability to substantiate a complaint or establish sufficient proof shall not, by itself, be construed as a false allegation. The ICC recognises that certain complaints may be difficult to prove and such

cases shall not be treated as instances of malicious intent. Similarly, any witness found to have provided false evidence or produced forged or misleading documents shall also be liable for appropriate action.

12. AWARENESS AND TRAINING

The Company shall take all necessary steps to ensure widespread awareness of this Policy amongst all persons covered under its scope. In furtherance thereof, the Company shall:

- include this Policy in the staff handbook and onboarding materials, and ensure that all new employees are trained on its contents as part of their induction;
- conduct periodic refresher training programs for all employees on the provisions of this Policy and the POSH Act;
- organise orientation programs and capacity-building sessions for ICC members;
- display the names and contact details of all ICC members at prominent locations in the workplace; and
- conduct awareness workshops using modules developed by the appropriate Government authorities to familiarise employees with the provisions of the POSH Act.

13. MONITORING, REPORTING AND REVIEW

The Company, with the approval of the Board or the Nomination and Remuneration Committee, may amend, substitute or replace any provision of this Policy, as and when deemed necessary, subject to compliance with the POSH Act. Any such amendment shall be communicated to all employees.

Nothing in this Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other applicable law or rule.

The ICC shall prepare an annual report containing the following details and submit the same to the Board for inclusion in the Company's Annual Report:

- number of complaints of sexual harassment received during the year;
- number of complaints disposed of during the year;
- number of cases pending for more than 90 days;
- number of workshops or awareness programmes conducted against sexual harassment; and
- nature of action taken by the employer in respect of complaints disposed of.

The annual report and MIS shall be prepared by the ICC and submitted to the Senior Management before the end of each financial year.

14. CONFIDENTIALITY

All complaints, proceedings, records and outcomes under this Policy shall be treated as strictly

confidential. The identity and address of the Aggrieved Person, the Respondent, and all witnesses shall not be disclosed to the media or the public. All proceedings shall be conducted in accordance with the principles of natural justice, fairness and impartiality, and every effort shall be made to protect the interests of all parties involved.

The decision of the Company pursuant to inquiry under this Policy shall be final and binding on all concerned. This shall, however, be without prejudice to the right of the Company or the Aggrieved Person to pursue such further legal remedies as may be available.

15. AMENDMENT

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. A modification may be necessary, among other reasons, to maintain compliance with local, state, federal, and central regulations and/or to accommodate organizational changes within the Company. However, no such amendment or modification will be binding on the Employees and Directors unless it is notified to them in writing.

16. COMMUNICATION OF THE POLICY

This Policy shall be posted on the website of the Company.

17. VALIDITY AND ENFORCEABILITY

In case any provision/ clause of this Policy is rendered unlawful or unenforceable due to any reason, the Policy shall be read by excluding that particular clause/ provision.

Particular	Details
Policy Name	POSH Policy
Regulatory Reference	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
Applicable Regulation	Prevention of Sexual Harassment (POSH) at Workplace
Adopted On	21-Jan-26
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