



## **1.0 Policy on prevention of sexual harassment at work place Sexual Harassment Policy (GLO/HRM/001/23)**

### **1. INTRODUCTION / PURPOSE**

GLOBELA PHARMA PVT LTD., we desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protect the dignity and respect of every individual. Integrity, honesty, transparency and respect for people remain some of our core values. Therefore, we have zero-tolerance for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

GLOBELA PHARMA PVT LTD. will exercise utmost care in treating the entire process with the dignity, sensitivity and respect it merits including protection of the victim / harassed.

### **2. APPLICABILITY**

“Rules for prevention and redressal of sexual harassment at workplace” is applicable to:

- i. Every employee across the GLOBELA PHARMA PVT LTD., permanent, temporary, Trainees or Interns, probationary and on contract;
- ii. An alleged act of sexual harassment, whether the incident has occurred during or beyond office hours which includes telecoms after office hour, business trips, business meetings and business related social events. This includes verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures. It also includes a demand or request for sexual favours in return for with a promise of work related favours such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.
- iii. This policy is only applicable when both or either the alleged harasser & the victim are employees/agents of the company. It is not applicable when both the alleged harasser & the victim are third parties.



### **3. DEFINITIONS:**

- i. “Complainant”: The person reporting an incident of Sexual Harassment
- ii. “Victim”: The person subjected to Sexual Harassment.
- iii. “Alleged Harasser”: The person who is alleged/reported to have committed an act of Sexual Harassment.
- iv. “Internal Committee” – An Internal Complaints Committee formed for enquiring into the complaints of sexual harassment
- v. “Presiding Officer” – means a senior female representative appointed from the organization to chair the internal Complaints Committee and also who has the veto powers.

### **4. INTERNAL COMPLAINTS COMMITTEE**

#### **4.1 Constitution and Role:**

- a. In accordance with Supreme Court Guidelines, to manage the process of enquiry and redressal of sexual harassment complaints, GLOBELA PHARMA PVT LTD. has formed an Internal Complaints Committee.
- b. The Company shall have an Internal Complaints Committee comprising 7 internal members and 1 external consultant.
- c. Not less than half of the members of the Complaints Committee shall be women.
- d. Names of the members of the Internal Complaints Committee along with their contact details are provided in Annexure A.
- e. The HR representative will periodically update the list of names and contact details of the members.
- f. The Presiding Officer and every member of the internal committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.
- g. Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the member.



#### **4.2 Functions and Powers of the Complaints Committee:**

- a) The Complaints Committee shall meet once a quarter and review preparedness to fulfil all requirements of the Sexual Harassment Act in the Company. Even in the event of there being no reported case of harassment, the Complaints Committee shall meet once in a quarter as aforesaid and review the preparedness of the Company in this matter.
- b) The quorum for the purpose of meeting/hearing shall be 2/3rd of the members of the Complaints Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting.
- c) The Presiding Officer of the Complaints Committee shall have veto power.
- d) The minutes of every meeting shall be recorded in the Minutes of the meeting maintained for the purpose and shared with the committee members over a mail.

#### **5. PROCESS OF REPORTING INCIDENT OF SEXUAL HARASSMENT**

Whom and how to contact in case of an incident of sexual harassment?

- a) An employee (the Victim) may send a written complaint/email the complaint to the Internal Complaints Committee or contact her Supervisors, Division heads or / and HRD department. If the employee (the Victim) is unable to contact or report the incident to any of the above, the employee may contact any other employee in the Company also in this regard, 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 the last incident.
- b) Provided further that the Internal Committee, 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.
- c) The complaint should include the contact details of the complainant / victim such as name, address, contact number, department etc. In all the cases above, the



written complaint/email must provide the details of the incident together with the name/s of the alleged harasser/s and the victim/s, as available.

**In case of a Conciliation:**

- a) The Complaints Committee may not order an enquiry, if examination of witnesses/documents is not necessary to arrive at a conclusion or if it could be settled with the Conciliation process. This conciliation process will not involve any monetary settlement.
- b) In either case, Complaints Committee shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.
- c) Where a settlement has been arrived at in the conciliation process, the same shall be recorded and has to be forwarded to the employer and district officer.
- d) The internal committee will provide the copies of the settlement arrived at after the conciliation process to the Victim as well the alleged harasser.

**In case of an enquiry into complaint**

- a) In the event, an enquiry is found to be necessary; the following procedure shall be adopted by the Committee:
  - 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.
- c) An enquiry is initiated through the members of the committee. This initial phase of committee meeting together to discuss the complaint of sexual harassment and discussing the process with the Victim, alleged harasser and complainant (if any) shall be completed within a period of 7 working days.
- d) Written record of all discussions are to be maintained by the committee
- f) The Enquiry shall be completed within a maximum period of 30 working days (4 weeks)
- g) Enquiry findings are to be recorded by the Internal Complaints Committee which will study findings and present the decision and the recommended action thereon to the Human Resources within a maximum period of 14 working days (2 weeks)



- h) The HR will clarify with the Internal Complaints Committee on the recommendation and will implement the same after informing the Management within a maximum period of 7 working days (1 week).
- i) On the completion of an Enquiry under this Act, the Internal Committee shall provide a final report and minutes of its findings to the Employer.

**6. APPEAL :**

If either party desires to appeal the decision, he/she may appeal in writing to the Managing Director who shall decide the appeal within seven days of the award.

**7. DISCIPLINARY ACTION:**

Possible Disciplinary Actions arising out of the Recommendations:

- I. A letter of warning that will be placed in the personal file of the harasser.
- II. Immediate suspension without pay or both.
- III. Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
- IV. Stoppage of increment with or without cumulative effect.
- V. Reduction in rank.
- VI. Termination/dismissal from the services of the Company.
- VII. Filing a Complaint before the relevant police station/Court.
- VIII. Any other action that the Disciplinary Authority may deem fit.

**9. POWER TO MAKE RULES AND AMENDMENT**

The power to make rules pertaining to sexual harassment at workplace vests with the Management Committee of GLOBELA PHARMA PVT LTD. Any changes to these rules shall be suitably communicated to all the employees.

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