

VAISHALI PHARMA LIMITED

**Policy on Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013**

Objective

Vaishali Pharma Limited (“the Company”) is committed and dedicated in providing a healthy and harassment free work environment to every individual of the Company. A work environment that does not tolerate sexual harassment. We highly respect dignity of everyone involved at our work place, whether they are employees, suppliers or our customers. We require all employees to strictly maintain mutual respect and positive attitude towards each other.

Meaning of Sexual Harassment

- a) Sexual Harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include abusive language or insults, unwelcome, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex- related jokes or unwelcome graphic comments about individual’s body structure in their presence or directed towards them.
- c) Any other unwelcomed physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcomed whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcomed gestures, inappropriate exposure, and the unwelcomed display of sexually explicit pictures and objects in any media.
- e) 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, as defined in (a) above, may amount to sexual harassment:—
 - (i) Implied or explicit threat of detrimental treatment at work;
 - (ii) To threat about present or future employment status;

- (iii) Interference and disturbance with work or creation of an intimidating or offensive work environment; or
- (iv) Humiliating treatment likely to affect health, safety or self-esteem

Policy Framework

- a) All Company employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All Company employees will understand and appreciate the rights of an individual to be treated with respect and dignity.
- c) All Company employees are required to maintain a harassment free environment in the office premises.
- d) All Company employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) This policy will protect Company employees from victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

Procedure for dealing with complaints of sexual harassment

- a) Company shall form an internal Sexual harassment Internal complaint committee (“Committee”) to deal with all the matters related to sexual harassment. A Senior female of the Company, employee will head the committee. The committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.
- b) If the person believes that he/she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Internal Sexual harassment Committee through the respective HR Manager or the Unit/Location/Department Head.
- c) Ideally, the complaint should be lodged immediately or within a reasonable period 1 month from the date of incident/last incident.

- d) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. There may be a need to nominate a senior person to head the investigation if required in a particular matter.
- e) The Committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- f) Any victimization of, or retaliation against, the complainant or any Company employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- g) The Committee would examine each case on its merit and take a decision from time to time, for conducting the enquiry proceedings.
- h) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the Committee post investigations may recommend disciplinary action against the complainer.

Disciplinary Action

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging complaint with the appropriate authority.

Sexual harassment will not be tolerated at the Company. If the outcome of an investigation by the Committee shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action as per the Law including termination of employment of the harasser,

Composition of Sexual Harassment Internal Complaint Committee

The Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the Committee shall comprise of the following:-

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) One employee member preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) One member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Committee shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to inquiry proceedings, recommendations of the Committee and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Committee.

Applicability

The Policy shall become operational from the date as may be approved by the Board of Directors in the Board Meeting of the Company.