

**POLICY ON SEXUAL HARASSMENT AT WORKPLACE (PREVENTION,
PROHIBITION AND REDRESSAL)**

OBJECTIVES

Ami Lifesciences Private Limited (hereinafter referred to as the “Company”) is committed towards creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company has zero tolerance for sexual harassment and believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the workplace or other than workplace if involving employees is a grave offence and is strictly prohibited by the Company.

This policy has been formulated to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees at the Company are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.

This Policy extends to all employees of the Company, whether permanent or on contract or any other, and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

The policy is made under the overall ambit of the Code of Conduct adopted by the Company and as per the statutory requirement in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, of India (hereinafter referred to as the “Act”¹) and existing rules framed thereunder namely the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the “Rules”²). as amended.

POLICY OBJECTIVE AND STATEMENT:

The purpose of this policy is to foster a respectful workplace through the prevention and prompt resolution of harassment and make Ami Lifesciences a workplace which figures as a satisfactory place for Employees to have their genuine concerns being looked into by the management via the Internal Committee formed for this purpose.

We at Ami Lifesciences are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Ami Lifesciences will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

SCOPE AND APPLICABILITY

This policy is applicable to all Employees of the Company regardless of the position, including those on contract with the Company. The policy will also cover trainees, consultants, visitors, contractors and outsourced staff associated with the Company. The policy will remain applicable wherever such persons have occasion to interact with each other including for example, in vehicles, third party premises, off site meetings and public venues. Harassment is unlawful irrespective of who is involved in the behavior.

DEFINITION:

- a. **"Act"** means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- b. **"Aggrieved woman"** means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subject to any act of sexual harassment by a Respondent and includes contractual, temporary employees and visitors.
- c. **"Employee"** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- d. **"Employer"** means the Company.
- e. **"Internal Committee"** means the committee constituted by the Company as per the Act.
- f. **"Respondent"** means a person against whom the aggrieved woman has made a complaint.
- g. **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) such as:
 - i. Physical contact and advances; or

- ii. A demand or request for sexual favours; or
- iii. Making sexually coloured remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature.

No woman shall be subjected to sexual harassment at any workplace. Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment.
- ii. implied or explicit threat of detrimental treatment in their employment.
- iii. implied or explicit threat about their present or future employment status.
- iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- v. humiliating treatment likely to affect the health and safety of the aggrieved person.
- vi. unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- vii. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- viii. eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- ix. act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- x. conduct of such an act at workplace or outside in relation to an employee of the Company, or vice versa during the course of employment; and
- xi. any unwelcome gesture by an employee having sexual overtones.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.

- b. "workplace" includes any department, organization, undertaking, establishment, enterprise, institution, office or branch unit, any place visited by the employee arising out of or during the course of employment including transportation provided by the

employer for undertaking such journey.

POLICY REQUIREMENTS:

- All Stakeholders of Company are strengthen for fostering a Harassment free work environment.
- All Employees shall be informed of this policy during recruitment and by general publicity during the course of their employment with the Company and shall be deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- Early Resolution Mechanism should be used to resolve problems of Harassment at the outset.
- The complaint process, including the investigation, if necessary, should be completed without undue delay.
- Corrective action must be taken timely in all situations of Harassment and the same must be communicated to all the parties involved in it.
- Harassment may result in corrective or disciplinary measures being taken, up to and including termination of respondent. Disciplinary or corrective measures may also be taken against the following: any manager who is aware of a Harassment situation and who fails to take corrective action; anyone who interferes with the resolution of a complaint by threats, intimidation or retaliation; or anyone who files a complaint that is frivolous or in bad faith.

RESPONSIBILITY AND AUTHORITY:

The ultimate responsibility and authority for applying this policy rests with the directors and his or her authorized representative(s) and Head of Human Resources and finally the board of directors.

INTERNAL COMMITTEE:

In accordance with the Sexual Harassment of Women at Workplace Act 2013, the Company has formed Internal Committee which will manage the process of enquiry and appropriate settlement of sexual harassment complaints in accordance with the statutory provisions.

Every complaint received shall be forwarded to internal committee formed under the policy for redressal. The investigation shall be carried out by the Internal Committee ("IC").

COMPLAINT REDRESSAL MECHANISM:

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the IC giving details of the sexual harassment meted out to her within 24 hours from the date of incident, however, maximum within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the IC.

The Presiding Officer or any Member of the IC can render reasonable assistance to the aggrieved woman for making complaint in writing, in case they are unable to do so.

On receipt of complaint, the IC shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The IC shall follow principle of natural justice while handling such complaints.

- (i) Where the aggrieved woman is unable to make a complaint on account of their physical incapacity, a complaint may be filed by:
 - a) a relative or friend ;or
 - b) a co-worker; or
 - c) an officer of the National Commission for Women or State Women's Commission; or
 - d) any person who has knowledge of the incident, with the written consent of the aggrieved person.
- (ii) Where the aggrieved woman is unable to make a complaint on account of their mental incapacity, a complaint may be filed by:
 - a) a relative or friend; or
 - b) a special educator or
 - c) a qualified psychiatrist or psychologist; or
 - d) the guardian or authority under whose care they are receiving treatment or care; or
 - e) any person who has knowledge of the incident jointly with any of the abovementioned persons.

- (iii) Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
- (iv) Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

MANNER OF INQUIRY:

The aggrieved woman or person authorised on her behalf as per the aforesaid provision, shall make a complaint to the IC as per the Act.

- a. At the time of filing the complaint, the complainant shall submit to the IC, six copies of the complaint along with supporting documents and names and address of witness.
- b. On receipt of such complaint, the IC shall provide a copy of the complaint received from the aggrieved woman to the Respondent within 7 working days.
- c. Respondent shall file his reply within a period not exceeding 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
- d. IC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
- e. The IC must complete its investigation within a period of 90 days.
- f. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- g. For conducting the enquiry, the quorum of the IC shall be of 3 members including the presiding officer.

The IC may before initiate an inquiry, and at the aggrieved woman's request, attempt to settle the matter through conciliation. However, IC shall ensure that no monetary

settlement shall be made as a basis of conciliation.

Where a settlement has arrived as mentioned hereinabove, the IC shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. The settlement terms shall be signed by both the parties and the IC shall provide the copies of the settlement to the aggrieved woman and the respondent.

Where a settlement is arrived as mentioned hereinabove, no further inquiry shall be conducted by the IC. The Committees may, during such investigation, exercise the power of a civil court, vested in it, in respect of:

- a. summoning and enforcing the attendance of any person and examining him under oath;
- b. requiring discovery and production of documents.
- c. any other prescribed matter.

MANNER OF ACTION:

1. The IC shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the IC may recommend that no action needs to be taken in the matter.
3. Except in cases where service rule exists, if the IC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take any action for sexual harassment as a misconduct including:
 - a. Written apology to the complainant, warning, reprimand or censure;
 - b. Withholding of promotions, pay rise or increments of the Respondent, terminating the Respondent from service;
 - c. Undergoing a counseling session or carrying out community service.
 - d. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine.
4. Such action will be taken within 60 days of the receipt of report.

ACTION FOR FALSE AND MALICIOUS COMPLAINTS:

Any complaint of sexual harassment shall be taken up with utmost seriousness by the Company. However, there shall be zero tolerance for any false and malicious complaint.

Except in cases where service rule exists, if the IC comes to a conclusion that the allegation was made with malicious intent or the aggrieved woman or any other person making the complaint on behalf of the aggrieved woman produced false or forged or misleading documents to prove its case, the IC may recommend the Employer to take action against the complainant who has made the complaint as per Clause VI (3) of this Policy. A similar recommendation to the Employer for taking action would be recommended against any witness whom the IC concludes, that he/she has given false evidence or produced forged or misleading documents.

CONFIDENTIALITY:

It shall be the duty of all the persons involved in the inquiry process to ensure that all complaints lodged are treated with utmost confidentiality. Any breach of this can invite disciplinary action before, during or after the inquiry.

PROTECTION AGAINST RETALIATION:

Retaliation is a serious violation of this policy. The Company forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case. (Examples of retaliation may include – but are not limited to - threatening a negative action on terms of employment, unsubstantiated negative performance evaluation, continued harassment in any form, discriminatory treatment or failure to provide or consider individual co If anyone feels that he / she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the **Internal Committee**.

As with complaints of harassment, this too will be treated as misconduct and the Company will take appropriate action to prevent / rectify the retaliation. It will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven. Similarly, bringing undue influence whether directly or indirectly, to the proceedings of an Inquiry by either party will be treated as misconduct and be subjected to disciplinary action.

RESPONSIBILITIES AND DUTIES OF THE EMPLOYER:

The responsibilities and duties of the Employer are as under:

- a. Provide a safe working environment.
- b. Formulate and widely disseminate an internal policy or charter declaring prohibition, prevention and redressal of sexual harassment at the workplace.
- c. Display conspicuously at the workplace, the penal consequences of indulging in acts that may constitute sexual harassment and the composition of the IC.
- d. Declare the names and contacts details of all members of the IC.
- e. Organize workshops and awareness programmed at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment and organizing orientation programmed for members of the IC.
- f. Provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry
- g. Treat sexual harassment as a misconduct under the service rules and initiate action for misconduct
- h. Prepare an annual report with details on the number of cases filed and their disposal and submit the same to the concerned authority.
- i. Monitor the timely submission of reports by the IC.

Designated Email Id and Contact Number where any sexual harassment complaints can be registered for all Locations of the Company:

Name: Birju Vinay Mistry

HR Designation: Head HR & Admin

HR Email Id: birju.mistry@amilifesciences.com

Contact number: 851161878

CONCLUSION:

The Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Company may amend constitution of Internal Committee as required for time to time, any such amendment in committee will be automatically substituted in this policy as approved by the Board. Copy of such resolution will form part of this policy.

The Central Internal Committee may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act with the approval by the Board. Any such alterations or amendment or rescinding will be intimated to the employees.

The identity and address of the aggrieved woman, respondent and witnesses shall not be published or disclosed to the public or media.

The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that the Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or the Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available under law.

SECTIONS OF THE INDIAN PENAL CODE (IPC):

Sexual Harassment and Punishment for Sexual Harassment Under the Indian Penal Code, the newly introduced Section (Section 354A) which deals with Sexual Harassment has made this a 'cognizable offence' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

- A man committing any of the following acts:
 - (i) physical contact and advances involving unwelcome and explicit sexual overtures; or
 - (ii) demand or request for sexual favours; or
 - (iii) showing pornography against the will of a woman; or
 - (iv) making sexually coloured remarks, shall be guilty of the offence of sexual harassment.

Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.

Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description (i.e. either simple or rigorous) for a term which may extend to one year, or with fine, or with both.

In addition to Section 354A set out above, acts of Sexual Harassment may also constitute other offences under IPC including Section 354 (assault or criminal force to woman with intent to outrage her modesty), Section 354C (Voyeurism), Section 354D (Stalking), Section 375 and 376 (Rape) and Section 509 (word, gesture or act intended to insult the modesty of a woman) of the IPC.

ANNEXURE 1
MEMBERS OF THE INTERNAL COMMITTEE FOR ADMINISTRATIVE UNITS
sOR OFFICES AT AMI LIFESCIENCES

AMI LIFESCIENCES PVT LTD				
Plot No. 82/B, ECP Road, At & Post. Karakhadi, Dist. Baroda, Gujarat 391450				
Block No: 85/B 99 & 100 Vill: Karkhadi, Tal: Padra Dist. Vadodara				
Designated Email Id - posh@amilifesciences.com				
Sr. No	Internal Committee Members-	Department	Designation	Contact
1	Presiding Officer: Yogita Sidhwani	Human Resources	Assistant Manager	6359608311
2	Member & Nodal Officer: Sandip Borse	Production	Senior Manager	8160102410
3	Member: Dipak Patel	Quality Control	Senior Manager	9408801900
4	Member: Vaishalee Patel	Research & Development	Manager	9974072856
5	Ashu Manchanda	-	External Member	8140417439

AMI LIFESCIENCES PVT LTD				
7th Floor, Lilleria 1038, Gotri-Sevasi Road, Baroda, Gujarat 390021				
Designated Email Id - posh@amilifesciences.com				
Sr. No	Internal Committee Members-	Department	Designation	Contact
1	Presiding Officer: Yogita Sidhwani	Human Resources	Assistant Manager	6359608311
2	Member & Nodal Officer: Jignesh Amin	Accounts & Finance	Assistant General Manager	9099051565
3	Member: Shrutika Jadav	Accounts & Finance	Senior Executive	7043598835
4	Member: Haresh Dodia	Marketing	General Manager	9925848038
5	Shraddha Panchal	-	External Member	9104333590

AMI LIFESCIENCES PVT LTD				
305, Nitco Biz Park, 3rd Floor, Road No.16, Wagle Estate, Thane (W)- 400604 Maharashtra, INDIA				
Designated Email Id - posh@amilifesciences.com				
Sr. No	Internal Committee Members-	Department	Designation	Contact
1	Presiding Officer: Yogita Sidhwani	Human Resources	Assistant Manager	6359608311
2	Member & Nodal Officer: Tejas Desai	Marketing	Associate Vice President	8879301117
3	Member: Pinky Goswami	Marketing	Senior Manager	9699466455
4	Member: Kamlesh Patel	Supply Chain Management	Senior General Manager	9821531363
5	Shraddha Panchal	-	External Member	9104333590



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Head HR Operations**



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Head HR**

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