

NON-DISCRIMINATION POLICY AND PREVENTION OF SEXUAL HARASSMENT(POSH)

A. Policy Purpose:

This policy aims to achieve the following:

- ✓ To create an awareness for the prevention of sexual harassment.
- ✓ To evolve a mechanism for the prevention and redressal of sexual harassment cases in the workplace and to assist the persons, who believe they have been subject to or have witnessed sexual harassment, to seek support and initiate appropriate remedial actions.
- ✓ To provide guidelines in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, which states Sexual Harassment as a violation of fundamental rights and a punishable offence.

B. Scope:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- ✓ All offices or other premises where the Company's business is conducted
- ✓ All company-related activities performed at any other site away from the Company's premises.
- ✓ Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

C. Policy Statement:

Spectrogen is committed to providing a workplace that is free from harassment, discrimination, victimization, regardless of gender, race, religion, place of origin, sexual orientation of a person employed or engaged by the company.

Spectrogen has a zero-tolerance approach towards sexual harassment and any action or behavior that equivalent of sexual harassment shall be considered as misconduct under company policies. Spectrogen shall also take appropriate measure for the protection against victimization, retaliation for reporting complaints as per the Code of Conduct & Business Ethics.

D. Definitions:

- ✓ **Complainant:** Refers to any employee (irrespective of the gender) who has lodged a complaint of sexual harassment at workplace or is deemed to have been subjected to any act of sexual harassment.
- ✓ **Internal Complaint Committee:** Internal Complaint Committee constituted in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.
- ✓ **Workplace:** Refers to all the offices of Spectrogen Pharmachem Limited and its departments, branches. It also includes any place visited by the employees arising out of or during course of employment including transportation provided by the Management of the establishment for undertaking the journey.
- ✓ **Sexual Harassment:** As defined in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013

E. ROLES OF ICC:

The Internal Complaints Committee (ICC) shall:

- ✓ Initiate inquiry as per the process mentioned in this policy
- ✓ Facilitate Conciliation if requested
- ✓ Recommend interim relief
- ✓ Conduct the inquiry following the principles of Natural Justice in keeping with the time frame laid down by the act.
- ✓ File recommendations and inquiry report to the management after completing the inquiry on time.
- ✓ Maintain confidentiality throughout and after the proceedings.
- ✓ Convene biannually to work on prevention of sexual harassment
- ✓ Submit annual report to District Officer

F. REDRESSAL MECHANISM:

Spectrogen encourages its employees to raise voice against any act of Sexual Harassment. Whenever an employee witnesses or experiences a conduct that amount to sexual

harassment, the employee may directly inform the harasser/respondent, that their behavior is unwelcome. However, if an employee/individual is not comfortable to inform the respondent, there are channels defined in this policy through which a formal complaint can be lodged.

➤ Lodging Complaint: The complaint should be made by the aggrieved employee within a period of 3 months from the date of occurrence. The complaint by an aggrieved employee shall be made to ICC in writing or can be sent by an e mail.

➤ **Receiving Complaint:**

- ✓ If the initial complaint is made to person other than ICC or its member, upon receiving such complaint, it will be the responsibility of the complaint receiver to report same to the ICC immediately.
- ✓ On receiving of the complaint, the ICC shall investigate and enquire into the complaint.
- ✓ The parties shall not be allowed to bring any legal practitioner to represent them at any stage of the inquiry proceedings before the ICC.
- ✓ All such complaints must be dealt with strict confidentiality.

G. INQUIRY OUTCOME AND ICC RECOMMENDATION:

After completion of the inquiry, the ICC shall forward its report with its recommendation to the Management. The Management shall examine the report and there after decide the punishment which can include written apology, warning, reprimand withholding of promotion, withholding pay rise, terminating the services. The disciplinary action shall be completed within 60 days of the receipt of the recommendations of the ICC.

H. INTERNAL COMPLAINTS COMMITTEE (ICC):

Sl. No.	Post of Committee Members	Name	Mobile Number	E-mail ID



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I. PENALTY:

False or malicious complaint and false evidence: Where the internal committee arrives at a conclusion that the allegation against the respondent is malicious, false or has produced any forged or misleading document, it may recommend to the employer to take action against the complainant.