

Policy: Anti-Sexual Harassment Policy	Version: 1.0
Effective from:	Scope: All employees

Policy Guideline

It is incumbent on all employees to follow this Policy and the guidelines formulated herein. The obligation to strictly adhere to the Policy guidelines is a pre-condition to the Contract of employment. Sexual Harassment at **and/or outside*** the work place will be deemed to be a violation/breach of terms of employment **and the Personal Code of Conduct**, and a crime in addition to violation of gender equality guaranteed under the constitution.

*** Any act of sexual harassment, even if perpetrated outside office premises, shall be deemed as an act of violation of the terms of employment & the Personal Code of Conduct.**

The following guidelines will be required to be observed at every location to ensure the prevention of Sexual Harassment:

1. Objective:

- 1.1 To ensure that all the employees **understand the implications of employee sexual harassment** & to establish clearly that the **Company is committed to providing a work environment that is free from discrimination** and sexual harassment in any form.
- 1.2 To ensure a **safe, secure and congenial work environment** for the Employees that is **free of sexual harassment**, to communicate that the company will take a **"Zero Tolerance"** approach towards sexual harassment
- 1.3 To explain what is sexual harassment and **how to deal with the conduct** if it arises and to **identify penalties** that can be imposed for such prohibited conduct.

2. Scope :

- 2.1 This Policy will apply to all locations of Jyothy Laboratories Limited (JLL) where our employees are based **and will extend to premises outside office also (Eg: An act of sexual harassment perpetrated during a meeting outside office)** and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

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2.2 Each locations of JLL must implement / adhere to the guidelines in this Policy. It shall be the **duty and responsibility of every location head to ensure prevention** or deter the commission of acts of Sexual Harassment and **to communicate the procedures** for the resolution, settlement or prosecution of acts of Sexual Harassment by taking all steps required.

2.3 The following shall be covered by the provisions of this policy :-

- (1) All full-time regular employees of JLL
- (2) All contractual & temporary employees of JLL
- (3) Suppliers & Business Partners
- (4) All others acting in the capacity of consultants, associates, etc. for JLL

3. Sexual Harassment in the Work Place – Definition

3.1 Sexual harassment has many different definitions and it is not the intent of this policy to limit the definition of sexual harassment, but to give employees as much guidance as possible concerning what activities constitute sexual harassment.

3.2 Sexual harassment refers to **any form of behavior, which is unwelcome & unsolicited**, which is **personally offensive, interferes with an individual's dignity** by creating an intimidating working environment.

3.3 Such unwelcome sexually determined behavior (whether directly or by implication) in any form, such as :-

- a) Unwanted physical contact and advances;
- b) A demand or request for sexual favours;
- c) Eve -teasing , jokes causing or likely to cause awkwardness or embarrassment ,gender based insults or sexist remarks ,sexually coloured remarks etc;
- d) Unwelcome sexual overtone in any manner over the telephone;
- e) Displaying pornography or other offensive or derogatory pictures , cartoons, pamphlets either deliberately or inadvertently;
- f) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

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- g) Physical confinement against one's will and any other act likely to violate one's privacy;
- h) Implied or overt promise of preferential treatment in employment;
- i) Implied or overt threat of detrimental treatment in employment;
- j) Implied or overt threat about the present or future employment status;
- k) Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or humiliating conduct constituting health and safety problems.

4. Complaints Procedure & Mechanism

⇒ **Employees are encouraged to report incidents of sexual harassment to:**

- a) **Their immediate supervisor and the HR Representative** for the respective location, and
- b) **To any member of the Apex Committee or the Sub Committee** constituted for the purpose.
- c) **In instances where a supervisor may be involved in the incident**, misconduct should be reported to a **higher level of Management** and to the **HR Representative** at the respective location.

⇒ **Escalations should be made as per the following process:**

Level 1: Inform Immediate Reporting Manager/Supervisor & HR

Level 2: In the event of absence of the above, inform Reporting Manager's Superior

Level 3: In the event of unavailability of the above 2, inform Head of concerned Department/ Division

Note: The victim is free to either escalate the complaint directly to the Apex Committee, or route it through any of the stakeholders mentioned in the escalation process highlighted above.

5. Role of the Reporting Manager/Superior/Head of concerned department/business division

- a. Respect confidentiality – Do not discuss anything with anyone
- b. Investigate and get the exact details (date, time, venue, any background information, exact nature of act, etc.)

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- c. Keep the tone right – For the complainant, a comfort level with openly discussing details is of prime importance.
- d. Provide necessary support, be empathetic.
- e. Be a patient listener – Do not jump to conclusions.
- f. Inform Apex Committee & concerned HR representative as soon as the complaint is brought to his/her notice.
- g. Carry out the discussion & subsequent investigations in a discreet manner at a neutral, unbiased place.
- h. Tell the victim to keep it confidential and not discuss with anyone till the issue is resolved.

6. Reporting of the Incident:

- i. The victim could report the incident either verbally (in which case it shall be mandatory for not less than 2 members of the Apex Committee to be present as witnesses to the reporting, and to sign a declaration to that effect. Also it shall be mandatory for the victim to sign a declaration with respect to exact comments made during the reporting)) or in writing (through a letter or through e-mail, to the supervisor or any member of the Apex Committee or the HR Representative.
- ii. In case the matter gets resolved by verbally talking to both the parties, within 3 working days then no formal written complaint would be made to the committee .However, if the employee who has been harassed is not satisfied with the outcome of this meeting, then he/she may submit the complaint in writing with his /her signature to the Complaint Redressal Committee within 7 days of the incident.
- iii. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer from Apex committee for lady employees involved and a male officer for male employees involved shall meet and record the statement.
- iv. It will be the duty of the person, to whom the incident has been reported; to file all complaints in writing and to bring the same to the notice of the Head of the Apex Committee.
- v. The complaint shall contain all the material and relevant details concerning the alleged sexual harassment including the names of the contravener. The Complainant can also

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submit any **corroborative material** with a **documentary proof**, oral or written material, etc., to **substantiate his / her complaint**.

- vi. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- vii. In the event, **the complaint does not fall under the purview of Sexual Harassment** or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

Note: In order to ensure speedy redressal of the complaint and prevent the work environment from getting vitiated further, it shall be the responsibility of the victim to report the incident as immediately and promptly as possible.

7. Investigation:

- i. The Complaint will then be investigated immediately, thoroughly and with a degree of confidentiality necessary for proper resolution of the complaint based on the facts of the case.
- ii. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an **opportunity to submit a written explanation** if she / he so desires **within 3 days** of receipt of the same.
- iii. **The Complainant** shall be provided with a **copy of the written explanation** submitted by the person against whom complaint is made.
- iv. If the Complainant or the person against whom complaint is made **desires to tender any witness/es before the committee**, they shall **communicate in writing to the Committee** the names of witness/es whom they propose to call. . Both shall affix his / her signature on the respective documents to certify these to be original copies. The Committee shall **call upon all witnesses** mentioned by both the parties.
- v. The Committee shall **provide every reasonable opportunity** to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

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- vi. The Committee members based on the facts of the case shall **complete the "Enquiry" within reasonable period but not beyond 15 days** & will then make the appropriate judgment in case the evidence is not conclusive.

8. Consequences :-

- a. Upon investigation, **appropriate disciplinary action, up to and including termination of employment**, will be taken against the Company Personnel who have been found guilty of violating the Policy.
- b. The disciplinary action could **range from a written warning letter in case of a minor offence to suspension from duties, transfer to other location, demotion, legal action, leave deduction and termination of services** depending on the gravity of the offence
- c. In the event Sexual Harassment is caused by or to an **outsider (this mean suppliers, business partners, associates, consultants, and other external parties dealing with JLL)**, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

9. TREATMENT OF FALSE COMPLAINTS/ ALLEGATIONS

- ⇒ This is a very sensitive area and any allegations/ complaints, however discreetly handled, could prove derogatory for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided.
- ⇒ In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management which may lead to suspension from duties, transfer to other location, demotion, legal action, leave deduction and termination of services etc.

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10. Constitution and Role of the Committee

- (i) An Apex Committee is constituted to redress the complaint made by the victim. The Committee will ensure time bound treatment of the complaints. The Apex Committee will also function as Complaints Committee for Head Office and Field Sales function. It will comprise of the following members, representing different sectors:

APEX COMMITTEE

NAME	ROLE	DEPARTMENT
Ms. NEETU KASHIRAMKA	CHAIRPERSON	FINANCE
Ms. RUPALI SAWANT	MEMBER	HUMAN RESOURCE
Ms. MANJULA KIRAN	MEMBER (Policy Co-ordinator)	OPERATIONS
Mr. SARATH CHAND JAMPA	MEMBER	SUPPLY CHAIN
Mr. AMBER AFTAB	MEMBER	MARKETING

- (ii) The role of the Apex Committee shall be to oversee and supervise and guide the entire process of resolution of the incident and complaint thereof at every respective location. The Committee has representation from all JLL locations & business divisions and the representative members will supervise the process at their respective locations.
- (iii) In case complainant is not satisfied with the findings or action he/she can approach **Ms. Jyothy M .R –Director – JLL** for further investigation & appropriate action.
- (iv) A consolidated annual report will be prepared by the Policy Coordinator and sent to the management in case any incident(s) occurs during the year.
- (v) Every Complaint of Sexual Harassment under this Policy should be summarized and maintained on file for three years. The Policy Coordinator will ensure this.

11. Criminal Proceedings

JLL can not take criminal action against the delinquent since it is a personal offence. However, JLL shall support the Complainant with necessary documents required for filing a criminal complaint against the delinquent.

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12. Confidentiality

The affected/victims making complaint of Sexual Harassment are assured of confidentiality. If problems cannot be resolved confidentially, the concerned complainant's approval will be taken before any further action is taken. If the complainant informs a Manager, other than the concerned committee member about the harassment, it shall be their duty to direct the complaint to the committee for further actions.

13. Immunity :-

Employees making complaint of Sexual Harassment are reassured that the use of the complaint procedure will not lead to reprisals, retaliation or coercion as a result of filing a complaint, unless it can be proved that the complaint was false or made for malicious intention.

14. Duty of relevant parties :-

Employee:

- To officially inform the respective committee member of the incident.
- To co-operate with the investigation and process

Committee member:

- To register and investigate reported incident while maintaining confidentiality
- To recommend appropriate action for consideration and implementation by the management.

Policy Coordinator:

- To consolidate the Annual Report in case of any incident(s) during the year.

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