



Policy on Prevention of Sexual Harassment at the workplace

Purpose

Cipla is committed to creating a healthy work environment that is free from any form of prejudice, harassment or discrimination regardless of gender, disability, marital status, age, race, religion, geographic origin, or any other perceived differences, and to prohibit, prevent and deter any acts of sexual harassment, and to provide a procedure for dealing with cases of sexual harassment in compliance with Cipla Code of Conduct and pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder.

Introduction

CIPLA is an equal opportunity employer. The Code of Conduct and this policy reiterates this commitment. The spirit of mutual trust and respect and an environment free from sexual harassment is central to this policy. Cipla is committed to protect the dignity and respect of every individual. At Cipla, we have zero tolerance for sexual harassment at the workplace.

The policy has been published under the overall ambit of the Code of Conduct and pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made there under (hereinafter referred to as the law).

Sexual harassment is a misconduct under employment rules or terms of employment/agreement and is a serious punishable offence. No employee shall engage or be party to any action, act or behaviour which is sexual harassment in nature.

The law in India is aimed to protect women at the workplace, however as an equal opportunity employer, Cipla policy extends to all employees and third-party employees, including all genders.

Scope and applicability

This policy is applicable to all employees based in India and employed at the Cipla Limited as per the POSH Act of 2013, including its subsidiaries and/or its affiliated or group companies. Accordingly, this policy is deemed to be incorporated in the employment rules or terms of employment/service conditions, agreement of all employees.

This policy is also applicable for remote/virtual ways of working including interactions through online meetings, conferences, calls etc. The employees are expected to conduct themselves in a manner as if they are working in the office, in terms of behavior, etiquettes and dressing.

This Policy is also applicable to any business meeting, social functions which may be held away from Cipla's workplaces where the relevant conduct or comments constitute sexual harassment or have an adverse impact on the workplace.

Exclusions from POSH Policy:

The Internal Committee (IC), while conducting inquiries on complaints that may not strictly fall under the definition of sexual harassment under Law, but may fall under workplace harassment or discrimination, is empowered to rely on the Cipla Code of Conduct. All recommendations by the IC to the management pursuant to such inquiries shall be based on misconduct and disciplinary action as defined in Cipla Service Rules and/or the Industrial Employment Standing Orders, as applicable. Sexual harassment is to be considered a MISCONDUCT and attracts penal consequences as envisaged in the Act and code of conduct.

Ownership and Compliance

The GCPO is the owner of this policy and will ensure that the policy is implemented in letter and in spirit by putting a right committee in place, organizing frequent workshops/ refresher sessions for its employees, etc.

Policy Statement

- Cipla has zero-tolerance towards any act of Sexual Harassment at workplace.
- The perception of the recipient is taken into consideration to assess the situation, not the intent of the perpetrator. Hence, subtle hints seeking sexual favours, double meaning comments and any probability of sexual harassment is viewed seriously in keeping with the zero-tolerance policy.
- In all cases of sexual harassment, the complainant will be required to notify to the IC or the Presiding Officer of the IC, in writing, so that the appropriate process of investigation and resolution can be followed.
- In case of any incident of Sexual Harassment, proper inquiry will be carried out and strict action will be initiated, in accordance with the policy.
- The victim will be assisted in filing a police complaint against the Respondent if requested in writing by the Complainant.
- No party shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.

Constitution of Committees:

At Cipla, we have constituted 2 committees that will be responsible for POSH investigations to ensure effective implementation of the policy and manage all cases:

- i. **Apex Committee** – It will consist of senior management team members, who will review functioning of all the ICs constituted in various locations.

- ii. **Internal Committee (IC)** - It will consist of middle and senior management team members, who will address and resolve complaints of sexual harassment in the workplace and provide a safe and secure environment for employees.

Apex committee against Sexual Harassment

At Cipla, we have created an Apex committee consisting of senior management team members, who will review functioning of all the ICs constituted in various locations, oversee its functioning and provide necessary support and guidance. In cases where the complaint is against any senior leader of the company, the Apex committee may be asked to investigate. It will also be responsible to study the investigation findings and verdict of the ICs and recommend final recommendation and verdict to the Management.

Internal Committee (IC) against Sexual Harassment

- IC shall consist of at least 5 (five) members namely:
 - i) Presiding Officer, a senior woman employee at the location (in the event of her unavailability, the Presiding Officer shall be nominated from other units or locations),
 - ii) 3 (three) or more Members from the employees
 - iii) 1 (one) member from NGOs or associations familiar with the issues relating to sexual harassment.
- At least 50% of the total Members nominated should be women.
- This committee will be treated as an independent Committee, appointed for a period of 3 years and will not include the Cipla Management. However, for the purposes of smoother administration, the Committee will route the communications to Management through the Employee Relations Head or Presiding Officer of IC.

- The details of the Presiding Officer and Members of IC to be made available to all employees at their respective units or locations. The notice will be displayed at a conspicuous location.
- Common email-id of IC (icc@cipla.com) shall be communicated to all employees. The access to this email id is restricted to the Presiding Officer of each committee and Corporate Employee Relations Head.
- It is the responsibility of the Corporate Employee Relations Head to review, monitor and report the POSH cases, ensure the smooth implementation and compliance of the POSH policy across all the locations, and wherever required to support the IC.
- The Corporate Employee Relations Head will also review and update the composition of the IC and ensure that the regular POSH trainings are conducted for IC members and employees.

Procedure

Filing a Complaint

- Any aggrieved person should file a complaint of Sexual Harassment via email to the IC on icc@cipla.com, within a period of 3 (three) months from the date of incident or in case of series of incidents, within a period of 3 (three) months from the date of last incident. A delay of an addition to 3 (Three) months can be condoned if the IC is convinced of the reason for the delay, provided in writing by the complainant.
- In the event, the complainant approaches their line manager/senior manager, functional head, the concerned manager should request the aggrieved person to approach the IC, even when the complaint is verbal in nature. The line manager/s are expected to strictly refrain from mediating the case and should refer immediately to the IC for further action. It is advised that the concerned managers should stay away from any interference/direction/protection/retaliation either independently or in conjunction with the respondent.
- In the event the aggrieved person is unable to complain in writing, the line manager/senior manager, functional head, the concerned manager or Presiding Officer or any member of IC shall provide reasonable assistance to the aggrieved

person for making the complaint in writing. Moreover, complaints may be filed on behalf of the aggrieved person by friends, relatives, officer of the National Commission for Women or State Women's Commission or any person who has knowledge or others in case of mental incapacity

- SHE-Box: In compliance with the provisions of the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013*, the organization recognizes the Sexual Harassment Electronic Box (SHe-Box), an initiative of the Ministry of Women and Child Development, Government of India, as an additional mechanism for lodging complaints of sexual harassment at the workplace. While the organization's Internal Committee (IC) shall remain the primary authority for receiving, inquiring into, and redressing such complaints, employees shall also have the option to submit complaints through the SHe-Box portal at <https://shebox.wcd.gov.in>. The use of the SHe-Box platform shall not preclude or limit the complainant's right to approach the Internal Committee directly
- It is the responsibility of all involved in the investigation to maintain and uphold the Confidentiality and sensitivity of the information pertaining to the POSH case.

Exceptions – Instances where a person other than the Aggrieved person can file a complaint.

- A colleague or a co-worker can initiate the complaint in place of the aggrieved person, in the aforesaid time frame, only if the aggrieved person is unable to do so and the IC is in agreement.
- Anonymous complaints will not be investigated by the IC. However, the same will be investigated as per the provisions of the Code of Conduct.
- Where the aggrieved person is unable to make a complaint on account of their physical incapacity, mental incapacity, or in case of the death of the aggrieved party – the complaint may be filed as per the provisions of Section 9 of the POSH Act, 2013.

Conciliation

- Before initiating an inquiry, IC may, at the request of the aggrieved person, take steps to settle the matter between the complainant and respondent through conciliation.

- No monetary settlement can be made based on conciliation.
- In case of settlement through conciliation, IC will record the settlement, with reasons and forward the same to the Management for specific action as per recommendation. Also, copies of the settlement will be provided to both complainant and respondent.
- In case, the terms of settlement are not complied with, IC will conduct a formal inquiry. Post-settlement, no further inquiry is required to be conducted by IC.

Conducting and Concluding Inquiry

- In the event, the complainant does not wish to initiate settlement through conciliation; an inquiry will be initiated against the respondent by IC.
- For every investigation at least 3 members including Presiding Officer and NGO member must remain present.
- IC will conduct all proceedings in a closed room and / or in camera (if required), wherein both the complainant and the respondent will be heard separately.
- At the time of inquiry, statements of both complainant and respondent will be recorded by IC and a reasonable opportunity will be given to both the sides to make representations and provide evidence, witnesses, if any.
- IC may cross-examine the complainant and the respondent.
- On request, witnesses may be allowed from each side to substantiate their claims.
- As per their discretion, IC may call upon or question any other person who they think might have knowledge of the incident.
- Any person who appears as a witness before IC must maintain the confidential nature of inquiry. In case such a person is found to be divulging any information to any other person, disciplinary action will be taken against them.
- If the respondent resigns during the inquiry itself, the Internal Committee may decide not to accept the resignation and complete its inquiry to ensure a fair and thorough process.
- The inquiry must be completed within a period of 90 (ninety) days of filing of the complaint.

- IC must follow the following milestones for conducting the investigation:
 - i) Within 3 (three) working days of receipt of a complaint against any incident of Sexual Harassment, the Presiding Officer must acknowledge the complaint and revert to the complainant regarding the options of redressal available with the IC.
 - ii) Within 2 (two) working days of receipt of a complaint against any incident of Sexual Harassment, the Presiding Officer must confirm verbally or in writing with the members of IC of recluse, that is as to whether there is any inability to be a part of the Committee to investigate the incident, say from the same department or function, etc. If there is any conflict of interest for the Presiding Officer, the management may nominate another Presiding Officer to lead the case.
 - iii) In such an event, the Presiding Officer must then invite any other members from the nominated list, who can be part of the Committee.
 - iv) The first meeting of IC must be held within 7 (seven) working days of receipt of complaint, wherein the members should fix the tentative schedule of meetings with the complainant, respondent, and any other persons, as required and issue the requisite notices in writing, detailing the date, time, and venue for the meetings.
- Within 45 (forty-five) days of receipt of complaint, the preliminary meetings with all concerned, including witnesses and any other persons, must be completed. IC must ensure that there are no delays in conducting the inquiry, at any stage, and that the inquiry should be completed in the shortest possible time frame.
- All proceedings conducted by IC must be recorded, in writing, including the notices and minutes of meetings of all interactions.
- The complainant, respondent or witnesses must consent to record the proceedings. Refusal to consent to the recording of the proceeding will constitute misconduct and separate disciplinary action will be taken.
- During the pendency of an inquiry, on a written request made by the aggrieved person, the Internal Committee may recommend to the Management:

- i) transfer of the Respondent to any other unit or location, or when given in writing then of aggrieved person / complainant.
 - ii) grant leave to the aggrieved person as per statutory provisions.
 - iii) suspend the accused for defined period or until the inquiry proceedings are completed, or
 - iv) grant any other interim relief to the aggrieved person as may be deemed fit.
- The special leave to be granted is only for the period of investigation, it cannot be more than 90 days in any case. As soon as the investigation is completed, the aggrieved person must report to work without any further delay.
 - The Internal Committee at the written request of the aggrieved person may recommend to the Management, to restrain the respondent from reporting to work or evaluating performance of the aggrieved person.
 - No transfer/change of role /change of location be decided by the IC/ functional head except with written request of the complainant/aggrieved person against the complainant, such actions should be decided for the respondent and to be communicated in writing including suspension pending enquiry or administrative leave as the case may be.
 - The IC will ensure that the inquiry is completed as per the timelines and should write a detailed report with a complete summary of the case, its findings, witnesses' statements, any evidence given by either party with proper reasoning.
 - Findings and report shall be provided to the concerned parties.
 - On conclusion of inquiry, if the allegation against the respondent is proved, IC will recommend an appropriate action against the Respondent which may range from:
 - i) be Admonished or Reprimanded or warned verbally or in writing.
 - ii) be suspended with full forfeiture of salary and allowance by an order in writing.
 - iii) be dismissed from service without notice.
 - iv) Pay compensation to the complainant as per statutory provisions if deemed appropriate by the IC.
 - On the completion of the inquiry, the IC will provide a report of its findings to the Management along with its recommendations. The IC should ensure that the report

is complete in all respect with witnesses' statements, any evidence given by either party. The Management will consider the recommendations of the IC and decide the disciplinary action as per the disciplinary process and code of conduct. The disciplinary action should be completed with 15 days of submission of report.

- On conclusion of inquiry, if the allegation against the respondent is not proved, the IC will forward the report to the Management recommending no action required.
- IC must hold a meeting on a quarterly basis irrespective of any complaint or proceeding and record the Minutes of the meetings.
- IC will submit an annual report of inquiries and recommendations to the Management and the District Officer as notified by the POSH Act of 2013.
- Records and documents on sexual harassment will be stored for a minimum of five (5) years from the date of commencement of the complaint, irrespective of the fact, whether the complainant or respondent are in the job or have moved on from the organization.
- Retaliation, in any form, by any other person against either victim or complainant or witness in such complaints tantamount to serious misdemeanor and strict disciplinary action will be taken against such employee.

Malicious or False Complaint

- On conclusion of inquiry, if IC determines that.
 - i) allegation against the respondent is malicious, or
 - ii) aggrieved person or any other person who has filed the complaint, has knowingly filed a false complaint, or
 - iii) aggrieved person or any other person has forged any evidence,then IC may recommend disciplinary action against such person.
- Unless malicious intent is established, mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant.

Strict Confidentiality

- The identity and addresses of the aggrieved person, complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of IC and the action taken by the Management will not be published, communicated, or made known to the public, press and media in any manner.
- The information may be used for POSH trainings without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the aggrieved person and witnesses.
- In case any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken contravenes the provisions of strict confidentiality, disciplinary action will be taken against such an individual.

Appeal

Any person aggrieved by the recommendations of the IC may appeal to the Management. Such an appeal is to be made within (90) ninety days of the recommendations by the IC.

Communication of Issues

- All queries regarding this policy should be addressed to the Head ER or Presiding Officer of the IC.
- Any non-compliance with this policy may be reported to the Global Chief People Officer or Global CEO.

Amendments and Waiver

The company reserves the right to amend and/or alter this policy at any time, in accordance with the applicable laws.

Annexure A - Key Definitions

1. **Aggrieved person** refers to a male or female employee of CIPLA, who is a victim of Sexual Harassment, during its employment, wherein the harasser may be of any gender.
2. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved person.

3. **Sexual Harassment**

Under this Policy apart from what goes with the term “sexual harassment” conventionally and by a common-sense approach, sexual harassment includes any undesirable, and/or unwelcome sexually oriented behavior (whether explicit or implicit) and shall include, without in any manner limiting the meaning or interpretations, thereof. Physical contact, sexually coloured verbal and/or written remarks or innuendos, showing, sharing, or distributing pornographic material, demanding, or requesting sexual favours, or any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature as well as the following sexually determined conduct:

- An implied or explicit promise of preferential/ detrimental treatment in the Employee’s employment.
- An implied or explicit threat about the Employees present or future employment status.
- Interference with the Employee’s work or creating an intimidating or offensive or hostile work environment for the Employee.
- Humiliating treatment likely to affect the Employee’s health or safety.

4. **Classification of Sexual Harassment** includes, but is not limited to the following:

- Physical harassment which refers to kissing, patting, pinching, or touching in an inappropriate manner or demand or request for sexual favours by action or any form of unwelcome physical contact of a sexual nature, may also include Constant follow up for meeting outside, party/get together, inviting /visiting in hotels etc.

Any unwelcome behavior 'under the influence of alcohol' cannot be treated as a justification for sexual advances / harassment.

- Verbal harassment which refers to unwelcome comments about a person's sex or private life, jokes and insinuations, sexually explicit conversation, suggestive comments about a person's appearance or body, demand or request for sexual favors, sexually colored remarks, or overture of sexual nature, Spreading rumors,
 - Non-verbal harassment which refers to sexually suggestive gestures such as nods, winks, gestures with hands, fingers, legs or arms and making colleagues uncomfortable by looking at their body while communicating with them.
 - Written, visual or graphic harassment which refers to sending text content or graphic content of sexually explicit nature, which may include but not limited to pornography, screen savers, calendars, desktop wallpaper, posters, pin-ups, websites, presentations or using emails, computer games, short messaging services, mobile messaging applications or multimedia messaging services for the above purposes, addressing unwanted communications, relentless pursuits and any communication or messages of a sexually explicit nature; and/or including unnecessary pressure to accept invite on any social media sites, forcing to check status, sexting, remarks on personal life etc.
- 5. Hostile Work Environment** refers to a work environment when unwelcome physical, verbal, gestural behavior or any written, visual, or graphic representations focusing on sexuality is present to interfere with the victim's work performance or be intimidating or offensive to a reasonable person.
- 6. Quid pro quo** refers to sexual favours 'in exchange' or "something for something" for any preferential treatment such as promotion, bonus, perquisites, increment, job offer, transfer, higher role /position. performance rating, employment reference checks or allocation of work or any detrimental impact thereof e
- 7. Workplace** refers to any office or business unit or any other place where the employee works or visits during the course of employment with CIPLA. It also includes any vehicle used for travel for work, duration of transportation and/or transit for travel.

- 8. Third parties**-This includes non-employees who have a work-related association with the workplace, such as vendors, consultants, or customers. If a third party is the complainant, the respondent's employer must investigate the complaint or report it to the police as appropriate. If a third party is the respondent, the complainant can file a report with the police or approach their employer with a complaint.
- 9. Internal Committee (IC) against Sexual Harassment** refers to a committee constituted, nominated in accordance with the law / policy, at all offices or business units of Cipla.
- 10. Romantic Relationships at Workplace:** The company does not encourage or discourage romantic relationships developing between two consenting employees. However, in case a relationship develops between two individuals who work in the same department or location and whether having a reporting relationship or not, it will be the responsibility of both the individuals to inform the concerned HR employee immediately, who may, on examination of the facts, prescribe such steps as he / she may think necessary, including change in reporting relationship and change in assignment, to ensure there are no conflict of interests or other undesirable consequences. In the event such a relationship goes sour, associated with feelings, misgivings, loss, or any kind of damage to the individual, any acts and consequences emanating from the same shall be the responsibility of concerned individuals. Such cases will be dealt with by the appropriate law enforcement agencies.

Human Resource Policy

Policy on Prevention of Sexual Harassment at the workplace

Version 1.2

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Human Resource Policy

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1.4	04/04/2023	Rule 6	Amendment	Flexibility of filing complaints
1.5	04/04/2023	Rule 8	Amendment	Confidential report of the complainant
1.6	01/06/2024	All	Modification	Review and revision of POSH Policy
1.7	01/05/2025	Page 5	Modification	Modification in Procedure – Filing a Complaint
1.8	10/06/2025	Page 5	Modification	Addendum – SHe-Box Integration