



Prevention, Prohibition and Redressal of Sexual Harassment and Discrimination at Workplace

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Table of Contents

1) Objective.....	3
2) Anti-Harassment and Anti-Discrimination Policy applicability	3
3) Sexual Harassment.....	5
4) Complaint Filing	6
5) Internal Committee - Constitution, Functions and Powers	7
6) Disciplinary Committee and CCRSH- Constitution, Functions and Powers	9
7) Disqualification of members of Internal Committee/ Disciplinary Committee/ CCRSH.....	10
8) General rules for the members of Internal Committee/ Disciplinary Committee/ CCRSH ...	11
9) General rules for the members of Internal Committee/ Disciplinary Committee/ CCRSH ...	12
10) Complaint Redressal - Conciliation/ Inquiry Procedure, Punishment & Recommendation...	14
11) Summary of Rights	19
12) Record Keeping	20
13) Duties and Responsibilities of the Employer	21
14) Confidentiality	23
15) False or Malicious Complaints and Evidence.....	23
16) No Retaliation or Victimization	24
17) Miscellaneous	24
18) Standards of Performance and Conduct	25
19) Annexures.....	26



1) Objective

1. Apollo Hospitals Enterprise Limited endeavors to foster a professional workplace environment that is free from all forms of harassment, including Sexual Harassment (as defined below), exploitation and intimidation. As an equal opportunity employer, Apollo Hospitals Enterprise Limited (referred to as "AHEL") is committed to this goal. AHEL strictly believes that all Employees and Third-Party Associates have a right to be treated with dignity and respect, and a right against unfair discrimination at the Workplace (as defined hereinafter).
2. AHEL prohibits all manner of harassment, including Sexual Harassment and any harassment and discrimination based on gender (including pregnancy, childbirth or medical condition), religion, caste, creed, race, color, age, national origin, physical or mental disability, gender identity or expression, sexual orientation, medical condition, genetic information, marital status, veteran status, military status, or any other characteristic protected by Central, State, or local law.
3. As part of its commitment to ensuring a safe workspace, AHEL takes the solemn responsibility to prevent Sexual Harassment through tailored training sessions for all employees, aimed at educating and raising awareness on this issue. Additionally, AHEL has established internal mechanisms for prompt and effective resolution of complaints raised by aggrieved individuals.
4. While legislative mandate for corporations is intended to protect only women, AHEL, as an equal opportunity employer, is committed to providing a Workplace free of Sexual Harassment to every individual. Therefore, AHEL has published this PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT and DISCRIMINATION AT WORKPLACE POLICY (the "Policy" for brevity) which is intended to be gender neutral. This Policy aims to comprehensively handle instances of Sexual Harassment and discriminatory behavior and offer remedial action regardless of the gender of the aggrieved individual.

2) Anti-Harassment and Anti-Discrimination Policy applicability

1. This Policy shall apply to AHEL and all entities/subsidiaries, franchises and associated concerns which are controlled or managed by AHEL. Where necessary based on context, the term "AHEL" or "Employer" shall individually refer to each of these entities.
2. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (collectively the "Act") has made it mandatory for every employer at a Workplace (as defined below) to formulate a policy against Sexual Harassment

Prevention, Prohibition and Redressal of Sexual Harassment and Discrimination at Workplace



of Women at Workplace. This Policy is framed in accordance with the provisions of the Act. In addition, the principles delineated within the Act, encompassing individuals and actions falling under legal jurisdiction, have been adopted to strengthen this Policy. The aim of this Policy is to comprehensively tackle all forms of prohibited harassment and discrimination within AHEL, offering a mechanism for redressal against such conduct within the company, irrespective of the gender of the aggrieved individual or the perpetrator.

3. This Policy applies to all employees of AHEL as defined in Section 2(f) of the Act whether such person are employer for any work on regular, temporary, ad hoc or daily wage 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, visiting doctors, lecturers, pharmacists, nurses, helping staff, any personnel on duty at any of the AHEL premises, franchises or associated concerns which are controlled or managed by AHEL, any interns, probationer, trainee, apprentice (the "Employees").
4. This Policy also applies to all AHEL vendor or subcontractor's - employees, off-roll employees, personnel, trainees, apprentice, interns, and consultants (the "Third Party Associates").
5. The Policy shall apply to all allegations of harassment and discrimination, including Sexual Harassment, committed by an Employee against an aggrieved person, if occurring at AHEL's Workplace as defined in Section 2(o) of the Act. The term "Workplace" as used in this Policy shall mean and include without limitation the following:
 - (i) where the Complainant (as defined hereinafter) is an Employee, any premises where the Employee is present in the course of discharging their duties of employment; and
 - (ii) where the Complainant is a Third-Party Associate, any premises where such Third-Party Associate is present in the course of discharging their contractual obligations to AHEL.
 - (iii) Where the Complainant is not an Employee or Third-Party Associate, the premises of AHEL.

It is clarified that the term 'Workplace' shall apply to all business-related activities of AHEL and shall include, but is not limited to, work related functions such as team events, client dinners, award functions, AHEL celebrations, business trips, college visits, nursing homes, pharmacies, ambulances, diagnostic centers, telehealth clinics, off-site meetings, office travel, seminars and conferences, places of accommodation arranged by AHEL including AHEL's residential areas, guest house, hostels, hotels etc.



3) Sexual Harassment

1. "Sexual Harassment" includes any unwelcome sexually determined behavior/conduct (whether directly or by implication) such as:
 - (i) physical contact and advances;
 - (ii) a demand or request for sexual favors;
 - (iii) sexually-colored remarks;
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
2. The following specific scenarios shall be considered Sexual Harassment at the Workplace if occurred or are present in relation to or connected with any act or behavior of Sexual Harassment:
 - (i) Implied or explicit promise of preferential treatment in employment;
 - (ii) Implied or explicit threat of detrimental treatment in employment;
 - (iii) Implied or explicit threat about present or future employment;
 - (iv) Interference with work or creating an intimidating or offensive or hostile work environment; or
 - (v) Humiliating treatment likely to affect health or safety.
3. Examples of actions of Sexual Harassment include, but are not limited to the following:
 - (i) Unwelcome sexual advances - These include patting, pinching, brushing up against, winking, hugging, kissing, fondling, or any other similar physical contact considered unwelcome.
 - (ii) Requests for demands for sexual favors - These include subtle or blatant pressures or requests for any type of sexual favors accompanied by an implied or stated promise of preferential treatment or negative consequence concerning an individual's employment status.
 - (iii) Sexually-colored remarks - These include verbal abuse or joking that is of a sexual nature and considered unwelcome or offensive by another individual. For example, comments about an individual's body or appearance where such comments are beyond mere courtesy, cracking of offensive jokes, sexually-oriented comments, innuendoes whether in person or through electronic / social media (WhatsApp, text messaging, email, Facebook, etc.) or any other actions that offend others.
 - (iv) Cyber-stalking - This includes repeated approach of sexual nature towards someone, using electronic communications, such as e-mail or instant messaging (IM), or messages posted to a website, blog, or discussion group etc.



Note: The examples listed above are indicative and not meant to be a complete list of objectionable behavior.

4. Other Indicators:

- (i) In addition to the above, determining what constitutes Sexual Harassment depends upon the facts and the context in which the conduct occurs. Sexual Harassment may take many forms - subtle and indirect, or blatant and overt.
 - a. It may be committed by any individual (Respondent), against any other individual (Complainant). For ex: an employee of AHEL against a visitor or patient;
 - b. It may occur between peers or between individuals in a hierarchical relationship;
 - c. It may be aimed at coercing an individual to participate in an unwanted sexual relationship or it may have the effect of causing an individual to change behavior or work performance; and
 - d. It may consist of repeated action or may arise from a single incident.
- (ii) Sexual Harassment complaints can be filed by any individual present at the Workplace, whether employed by AHEL or not. Sexual Harassment complaints by women shall be filed only before the Internal Committee.
- (iii) Relationships (sexual or otherwise) which are consensual are not unlawful, as such relationships are the private business of the concerned persons unless they are in conflict with AHEL's policies, or they prejudice the legitimate business interests of AHEL in any manner whatsoever.

4) Complaint Filing

1. AHEL encourages its Employees to come forward and file a complaint against any act of harassment they encounter at the Workplace.
2. Complaints against harassment or discrimination are to be addressed to the Disciplinary Committee (as defined below) as per this Policy. The Format of the complaint for harassment & discrimination is as attached as Annexure 1 of this Policy.
3. Complaints against Sexual Harassment faced by women at Workplace are to be addressed before the Internal Committee (as defined below) as per this Policy. The Format of the complaint regarding incidence of Sexual Harassment is attached as Annexure 1 of this Policy.
4. Complaints against Sexual Harassment faced by individuals other than women at Workplace are to be addressed before the Disciplinary Committee (as defined below) as per this Policy.



The Format of the complaint regarding incidence of Sexual Harassment faced by individuals other than women is attached as Annexure 1 of this Policy.

The Complainant may lodge a complaint with the Internal Committee or the Disciplinary Committee on the respective Email ID(s) provided in Annexure 2 (Internal Committee) and Annexure 3 in (Disciplinary Committee).

5) Internal Committee - Constitution, Functions and Powers

1. Constitution of the Internal Committee

- (i) Every Unit of AHEL should have an Internal Committee to address grievances regarding Sexual Harassment of Women at Workplace in accordance with Section 4 of the Act (the “**Internal Committee**”). The number of members in the Internal Committee in no circumstance shall fall below four (4) or lower than the minimum number of members, if any, prescribed by the Act or the Rules.
- (ii) Members: Amongst the members of the Internal Committee-
 - a. the presiding officer shall be a woman employed in a senior role at AHEL (the “**Presiding Officer**”). If a senior woman officer is not available for a location, the Presiding Officer can be nominated from amongst the Employees in other offices.
 - b. Not less than two (2) members shall be selected from amongst the Employees committed to the cause of women or who have experience in social work or have legal knowledge of matters concerning Sexual Harassment (together “**Employee Members**”);
 - c. There shall be one (1) External Member who is familiar with the issues relating to Sexual Harassment;
 - d. It is mandated that not less than half of the members of the Internal Committee shall be women.
- (iii) All members of the Internal Committee shall be selected or approved by the Board of Directors or their delegate. A “**delegate**” for the purposes of this Policy shall mean either the Unit HR Head who must act in consultation with the Unit Business Head or any other employee or officer to whom the board of directors of AHEL has delegated this authority through a Board Resolution. The Company will notify the change of



delegate, if at all, from time to time. The present list of members of the Internal Committee is provided in Annexure-2 attached to this Policy.

- (iv) The names of the members of the Internal Committee shall be displayed, from time to time, on the notice board(s) at each of its Workplace across the country, and/or the internal website / intranet of AHEL. AHEL shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Internal Committee. The present members of the Internal Committee are provided in **Annexure-2** of this Policy.

- (v) Presiding Officer and every other member of the Internal Committee shall hold office for such period not exceeding three (3) years from the date of their nomination, as may be specified by the Board of Directors or their delegate.

2. Functions of the Internal Committee

The Internal Committee shall discharge such functions including in receiving and investigating any complaints relating to Sexual Harassment of women present at the Workplace, whether employed or not, as per the Act. In particular, the Internal Committee shall:

- (i) Work towards implementation of this Policy;
- (ii) Conduct inquiries in accordance with the procedures set out in this Policy and the Act applying the principles of natural justice and ensuring compliance with the Policy in all actions taken under, or in connection with, this Policy;
- (iii) Keep a record of all complaints received and the actions taken by the Internal Committee and AHEL thereon.
- (iv) At the end of each calendar year or at such intervals as notified in the Act, prepare a consolidated report of all the complaints relating to Sexual Harassment received for the year and the actions taken by AHEL thereon ("IC'S Annual Report") and shall submit the same to the concerned government department with a copy to the management of AHEL.

3. Powers of Internal Committee:

The Internal Committee shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 when conducting an inquiry under this Policy. The Internal Committee shall have the power to:

- (i) Summon and enforce attendance of any person and examine such person on oath;
- (ii) Require the discovery and production of documents.



Note: Where Sexual Harassment occurs as a result of an act or omission by an outsider, while the Internal Committee or the Disciplinary Committee, as the case may be, may not be in a position to investigate or take any direct action against such outsider, it shall take all steps necessary to assist the affected person in terms of support and preventive action. An outsider shall include a patient, patient's visitor, etc.

6) Disciplinary Committee and CCRSH- Constitution, Functions and Powers

1. Constitution of Disciplinary Committee

- (i) AHEL under this Policy shall constitute a Disciplinary Committee in every Unit ("Disciplinary Committee"). For the purpose of this Policy, "Unit" shall mean any Independent Business Unit, Regional or Corporate Office of AHEL.
- (ii) The present members of the Disciplinary Committee are provided in Annexure-3 of this Policy.
- (iii) The constitution and term of the Disciplinary Committee will be decided and approved by the Board of Directors or their delegate.
- (iv) The names of the members of the Disciplinary Committee along with their contact details shall be displayed, from time to time, on the notice board(s) at each of its offices/premises across the country, and/or the internal website / intranet of AHEL. AHEL shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Disciplinary Committee, or to the contact details of the members of the Disciplinary Committee. The present list of Members is provided in Annexure-3 attached to this Policy.

2. Functions of the Disciplinary Committee

- (i) Disciplinary Committee shall only hear and investigate the following complaints:
 - a. All cases of Sexual Harassment filed by individuals other than women.
 - b. All cases of harassment, other than Sexual Harassment of women at Workplace, filed by an Employee or Third-Party Associate.
 - c. It is clarified that in the event Disciplinary Committee is in receipt of any complaint by a woman of Sexual Harassment at Workplace, it shall on the same day, and in any event not later than 24 hours, forward the same to the Internal Committee without any delay. Disciplinary Committee shall not take on record or investigate any complaint on Sexual Harassment faced by a woman at Workplace, which is the statutory duty of the Internal Committee.



- (ii) In addition to point (i) above, the Disciplinary Committee shall also have the following functions:
- a. Work towards implementation of this Policy;
 - b. Conduct inquiries in accordance with the procedures set out in this Policy applying the principles of natural justice and ensuring compliance with the Policy in all actions taken under, or in connection with, this Policy; and
 - c. Keep a record of all complaints received and the actions taken by the Disciplinary Committee and AHEL thereon and file a yearly report ("DC's Annual Report") to the CHRO of AHEL or their respective delegate.

3. Constitution of Corporate Committee for Redressal of Sexual Harassment of persons other than women

AHEL has constituted a Corporate Committee for Redressal of Sexual Harassment ("CCRSH") to address appeal of the party before the Disciplinary Committee who is not satisfied with the recommendations of the Disciplinary Committee. It is clarified that CCRSH cannot entertain any appeals against the order of Internal Committee in any manner. The Appeal against the recommendations of the Disciplinary Committee can alone be submitted before the CCRSH by email to its members as per the details mentioned in Annexure 4 of this Policy. CCRSH shall hear and dispose of the appeal within 90 days from the date of receipt of the appeal. The present members of CCRSH are listed in Annexure 4 of this Policy.

4. Powers of Disciplinary Committee and CCRSH

The powers of the Disciplinary Committee and CCRSH in the inquiry of any complaints/appeal shall be such as approved by AHEL from time to time. The Disciplinary Committee and the CCRSH is not vested with the same powers as that of the Civil Court under Code of Civil Procedure, 1908. However, the provisions of the Code of Civil Procedure, 1908 may be taken as guiding document by the Disciplinary Committee/CCRSH in the disposal of any complaints before it.

7) Disqualification of members of Internal Committee/ Disciplinary Committee/ CCRSH

- (i) A member of the Internal Committee/Disciplinary Committee/CCRSH shall cease to hold office as a member in the event such member:



- a. guilty of disseminating information about a complaint brought before the Internal Committee/Disciplinary Committee/CCRS, including details of the Complainant or the Respondent;
 - b. Is found guilty in any disciplinary proceeding; or
 - c. Has so abused such member's position in such a manner as to render such member's continuance in office prejudicial to the interests of the Employees of AHEL.
- (ii) In addition to the grounds mentioned above, an Employee Member shall cease to hold office as a member of the Internal Committee/Disciplinary Committee/CCRS in the event of any of the following occurrences:
- a. If the Employee Member ceases to be an Employee of AHEL;
 - b. If the Employee Member has been found guilty of committing an act of Sexual Harassment; OR
 - c. Any misconduct in accordance with the rules of AHEL.
- (iii) If the Employee Member is related to the Respondent and/or the Complainant or is otherwise conflicted in any manner whatsoever, they must recuse themselves from the Internal Committee/Disciplinary Committee/CCRS, for that particular matter.
- (iv) In the event of any disqualification, resignation or termination of appointment (by AHEL) of any member, AHEL shall, with respect to an outgoing Employee Member, forthwith notify a substitute Employee Member and shall, with respect to the other members, make best efforts to find a substitute member as quickly as possible.

8) General rules for the members of Internal Committee/ Disciplinary Committee/ CCRSH

- (i) The Internal Committee must keep in strictest confidence details of any complaints before it and shall only disclose or divulge such information in such manner and events as permitted in the Act.
- (ii) The Disciplinary Committee/CCRS must keep in strictest confidence details of any complaints before it and shall only disclose or divulge such information in such manner and form as approved by the CHRO or their respective delegate.
- (iii) The decisions of the Internal Committee/Disciplinary Committee/CCRS shall be made by majority vote of its members, and in cases of division of votes equally, the Presiding Officer shall have a casting vote.



9) General rules for the members of Internal Committee/ Disciplinary Committee/ CCRSH

1. Initiation of Complaint before Internal Committee

- (i) Who can make a complaint?
 - a. Any Woman, Employee or in any other capacity, who has experienced or has been subjected to any act of Sexual Harassment by another Employee (the "Complainant") shall be entitled to lodge a formal complaint in writing to the Internal Committee.
 - b. Where the Complainant is unable to make a complaint on account of physical incapacity, a complaint may be filed on the Complainant's behalf by a relative, friend, co-worker, an official of the National/State Commission for Women, or with the prior written consent of the Complainant, by any person who has knowledge of the incident.
 - c. Where the Complainant is unable to make a complaint on account of mental incapacity, a complaint may be filed on the Complainant's behalf by a relative, friend, a special educator, a qualified psychiatrist or psychologist, the guardian or authority under whose care the Complainant is receiving treatment or by any person who has knowledge of the incident jointly with any of the other persons mentioned above. Where the Complainant is dead, a complaint may be filed by any person who has knowledge of the incident with the prior written consent of the legal heir of the deceased Complainant.
- (ii) When to make a complaint?

The Complainant is required to lodge a complaint promptly or no later than three (3) months from the date of occurrence of the alleged act of Sexual Harassment, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The Internal Committee, as the case may be, can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.
- (iii) How to make a complaint?

The complaint shall be made in writing. The Complainant is required to submit six (6) copies of the Complaint along with evidence and the names of witnesses (if any) to the Internal Committee. Where the Complainant is unable to file the complaint in writing, the Presiding Officer or any other member of the Internal Committee shall provide reasonable assistance to the Complainant in making the complaint in writing.



Provided however, in no event shall any member of the Internal Committee shall write the complaint on behalf of the Complainant.

The Complainant may submit a written complaint to the Internal Committee via email at the address specified in Annexure 2.

2. Initiation of Complaint before Disciplinary Committee

(i) Who can make a complaint?

Any Employee who has experienced or has been subjected to any act of harassment or discrimination (other than the incident covered in (a) above) by another Employee or agent of AHEL (the “Complainant”) shall be entitled to lodge a formal complaint in writing to the Disciplinary Committee by sending an email to the Presiding Officer or any other member of the Disciplinary Committee (Email ID specified in Annexure 3)

(ii) When to make a complaint?

The Complainant is required to lodge a complaint promptly or no later than three (3) months from the date of occurrence of the alleged act of harassment, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The Disciplinary Committee, as the case may be, can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

(iii) How to make a complaint?

The complaint shall be made in writing. The Complainant is required to submit six (6) copies of the Complaint along with evidence and the names of witnesses (if any) to the Disciplinary Committee, as the case may be. Where the Complainant is unable to file the complaint in writing, the presiding officer or any other member of the Disciplinary Committee shall provide reasonable assistance to the Complainant in making the complaint in writing. Provided however, in no event shall any member of the Disciplinary Committee shall write the complaint on behalf of the Complainant. The Complainant can send the complaint via email to the Presiding Officer or any other member of the Disciplinary Committee (Email ID specified in Annexure 3).

3. Process to be followed after the receipt of complaint in writing by the Internal Committee and the Disciplinary Committee



- (i) On receipt of the complaint, the Internal Committee, or the Disciplinary Committee, as the case may be, shall serve a copy thereof to the Respondent within a period of seven (7) working days.
- (ii) On receiving a copy of the complaint filed by the Complainant, the Respondent shall file a response to the complaint along with supporting documents, and names and addresses of witnesses within a period not exceeding ten (10) working days from the date of receipt of the copy of the complaint as aforesaid.

Note: If the Disciplinary Committee receives a Sexual Harassment complaint from a woman, they shall immediately forward the complaint to the Internal Committee. On receipt of the complaint, the Internal Committee shall proceed in accordance with the provisions of this Policy.

10) Complaint Redressal – Conciliation/ Inquiry Procedure, Punishment and Recommendation

1. Basic Procedure

There are primarily two (2) basic procedures that can be followed by Internal Committee/ Disciplinary with respect to any allegation of harassment, i.e.:

2. Conciliation

- (i) Prior to initiating an inquiry into the Complaint, the Internal Committee/Disciplinary Committee may, only at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.
- (ii) If a settlement is reached between the Complainant and the Respondent, the Internal Committee/Disciplinary Committee shall record the settlement so arrived at and forward the same to AHEL, directing AHEL to take appropriate action as recommended by the Internal Committee/Disciplinary Committee.
- (iii) The Internal Committee is required to provide the Complainant and the Respondent with copies of the settlement for their records.



- (iv) In the event a settlement is reached between the Complainant and the Respondent under this clause, no further inquiry shall be carried out by the Internal Committee/Disciplinary Committee.

3. Inquiry Procedure

The inquiry procedure of redressal of a Complaint submitted to the Internal Committee/Disciplinary Committee shall include:

(i) Processing of the Complaint

The complaint shall be processed by the Internal Committee/Disciplinary Committee upon either:

- a. the failure of the conciliatory procedure under sub-paragraph 2 above;
- b. the Complainant opting for the Inquiry Procedure; or
- c. the Respondent failing to comply with any of the terms of the conciliation settlement or otherwise, the details of the complaint shall be circulated to the members of the Internal Committee/Disciplinary Committee.

The complaint shall be kept in the strictest of confidence at this stage. The Presiding Officer of the Internal Committee/Disciplinary Committee shall then call a meeting of the Internal Committee/Disciplinary Committee to begin the inquiry procedure.

(ii) Inquiry/Investigation Procedure

- a. The Internal Committee or the Disciplinary Committee, as the case may be, shall make an inquiry into the complaint in accordance with the principles of natural justice. All proceedings of the Internal Committee or Disciplinary Committee, as the case may be, shall be conducted in the presence of a minimum of three (3) members of the Internal Committee or Disciplinary Committee, as the case may be ("Quorum"). The Presiding Officer of the said Committee must be present for all proceedings.
- b. During the inquiry process, the Internal Committee or Disciplinary Committee, as the case may be, may also pass interim order(s)/reliefs as deemed appropriate.
- c. The Internal Committee or Disciplinary Committee, as the case may be, shall decide in each case on the appropriate process for gathering relevant information from the Complainant, the Respondent and any witnesses. This may include oral and/or



written statements but in each case the Complainant and the Respondent will have the opportunity to present their case to the Internal Committee or Disciplinary Committee, as the case may be, in person. The hearing will be conducted at such location as may be decided by the Committee keeping in view the need to maintain confidentiality of the investigation. However, the convenience of the Complainant and the Respondent will also be taken into consideration. The Internal Committee shall notify via email, the Complainant, and the Respondent (as well as the witnesses, if any) of the time and venue of the hearing(s) at least three (3) days prior to the scheduled date.

- d. The Internal Committee or Disciplinary Committee, as the case may be, shall also have the right to terminate the inquiry proceedings or to give an ex parte (ex-party) decision upon providing fifteen (15) days prior written notice, in the event the Complainant or Respondent fails to be present before the Internal Committee or Disciplinary Committee, as the case may be, without showing sufficient cause for three (3) consecutive hearings.
- e. The Internal Committee or Disciplinary Committee shall record the entire process of hearing and shall consider the minutes, duly signed by the parties to the inquiry, as a token of their acceptance to the record.
- f. If the respective Committee so desires, the Committee shall summon or call upon (by way of written notice) any Employee, outsider, or others to appear before the Committee as a witness.
- g. The parties are not permitted to engage any legal practitioner or other third party to represent them in their case at any stage before the Internal Committee or Disciplinary Committee, as the case may be.
- h. During the pendency of the inquiry, on a written request made by the Complainant, the Internal Committee or Disciplinary Committee, as the case may be, shall have the right to recommend any one (1) or more of the following to AHEL, at the Internal Committee's or the Disciplinary Committee's sole discretion (given the facts and circumstances of each case):
 - Transfer the Complainant or the Respondent to any other Workplace;
 - Grant paid leave to the Complainant for a period of up to three (3) months in addition to the regular normal leave entitlement of the Complainant;
 - Restraine the Respondent from reporting on Complainant's work performance or writing confidential report, and assign the same to another person;
 - Change the reporting if Complainant reports to the Respondent; or



- Suspend the Respondent during the pendency of the Inquiry; or
 - Grant such other relief to the Complainant as it may deem fit.
- i. The Internal Committee or Disciplinary Committee, as the case may be, shall complete the inquiry within a period of ninety (90) days from receiving the complaint.

¹ Natural justice is a concept of common law and represents the procedural principles developed by the Courts, which every judicial, quasi-judicial and administrative agency must follow while taking any decision adversely affecting the rights of a private individual. Natural justice implies fairness, equity and equality. The principle of natural justice encompasses the following two rules: - (i) No one should be made a judge in his own cause or the rule against bias; and (ii) no one should be condemned unheard

(iii) **Report**

- a. Upon completion of the hearing, the Internal Committee or Disciplinary Committee, as the case may be, shall prepare a confidential report (the “**Report**”), which shall include a summary of the proceedings, the evidence adduced by the parties and the witnesses, and shall submit the same to AHEL within a period of ten (10) days from the date of completion of the inquiry.
- b. Any person aggrieved by the recommendations of the Internal Committee may make an appeal against the same under Section 18 of the Act, within a period of ninety (90) days from the date on which the recommendations are made.
- c. Any person aggrieved by the recommendations of the Disciplinary Committee may make an appeal against the same before the CCRSH, within a period of ninety (90) days from the date on which the recommendations are made. The CCRSH will conduct a thorough inquiry with Unit/Regional Head and the Parties involved to understand the issues involved.
- d. The Report shall further set out the Internal Committee’s or the Disciplinary Committee’s conclusions on whether an offense of Sexual Harassment, or any other violation of this Policy, has been committed or occurred, or whether the complaint made by the Complainant is false and based on *mala fide* reasons (for reasons/ rationale to be recorded in writing in each instance thereon). The Report shall further set out the Internal Committee’s or Disciplinary Committee’s recommendations on the disciplinary action(s) to be taken in the circumstances. All members of the Internal Committee or the Disciplinary Committee, as the case may be, shall sign the said Report.



- e. A copy of the Report must be made available to both parties (to both Complainant and Respondent) enabling them to make representation against the findings, if required.

4. Implementation

- (i) Depending upon the gravity of the offense and without prejudice to any legal right(s), AHEL, in the event the Internal Committee or Disciplinary Committee, as the case may be, is of the view that the incident of Sexual Harassment against Employee at Workplace or any other violation of the Policy has been proved, the Internal Committee or the Disciplinary Committee, as the case may be, shall forward the Report to AHEL and make any of the following recommendations to AHEL:
 - a. To take action against the Respondent including:
 - declaring the action to be "misconduct" under the provisions of the applicable service rules (if any) or the Respondent's employment agreement;
 - procuring from the Respondent a written apology
 - issuing a warning, reprimand or censure;
 - withholding of promotion;
 - withholding of pay rise or increments;
 - termination from service;
 - direction to undergo counseling sessions; and/or
 - direction to carry out community service.
 - b. Additional powers of the Internal Committee: The Internal Committee, must recommend, in addition to the punishment provided above, to deduct from the salary of the Respondent, such sum as it may consider appropriate to be paid to the Complainant and in the event AHEL is unable to deduct such amount due to the Respondent being absent from duty or cessation of employment, the Respondent can be directed to pay the amount directly to the Complainant. Further, in the event the Respondent fails to pay such an amount, the Internal Committee shall forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer authorized under the Act. It is clarified that this power in Clause b) is not vested with the Disciplinary Committee.



- (ii) The aforesaid recommendations are illustrative and not exhaustive and the Internal Committee or the Disciplinary Committee, as the case may be, may make such other recommendations as it may deem fit.
- (iii) The Board of Directors of AHEL or its delegate, as the case may be, shall give effect to the recommendations of the Internal Committee or the Disciplinary Committee, as the case may be, within a period of sixty (60) days from the date of receiving the Report.

5. Quantum of Compensation to be decided by the Internal Committee

In the event the Respondent is found guilty, and the disciplinary action taken by the Internal Committee includes the payment of a monetary settlement to the Complainant, the Internal Committee shall consider the following in arriving at the quantum of compensation payable to the Complainant:

- a. the mental trauma, pain, suffering and emotional distress caused to the Complainant;
- b. the loss in career opportunity due to the incident of Sexual Harassment;
- c. medical expenses incurred by the Complainant for physical or psychiatric treatment;
- d. the income and financial status of the Respondent; and
- e. the feasibility of such payments in installments or a lump-sum amount

11) Summary of Rights

1. Complainant's Rights

- (i) Right to be protected against retaliation or prejudice.
- (ii) Right to confidentiality during the inquiry process and even after the conclusion of the proceedings.
- (iii) Right to be informed of the progress and outcome of the investigation as per the provisions of the Policy.
- (iv) Right to a fair and unbiased inquiry.
- (v) Right to seek reasonable assistance from the respective committee during the inquiry process.
- (vi) Right to file an appeal with the appropriate authority against the recommendations of the Internal Committee or the Disciplinary Committee, as the case may be.
- (vii) Right to seek clarification on the Policy provisions from the Unit HR Head.

2. Respondent's Rights



- (i) Right to be informed of the allegations in the complaint.
- (ii) Right be given an opportunity to provide statement of defense in accordance with the provisions of this Policy and the applicable laws.
- (iii) Right to confidentiality during the inquiry process and even after the conclusion of the proceedings.
- (iv) Right to a fair and unbiased inquiry.
- (v) Right to seek reasonable assistance from the respective committee during the inquiry process.
- (vi) Right to file an appeal with the appropriate authority against the recommendations of the Internal Committee or the Disciplinary Committee, as the case may be.
- (vii) Right to seek clarification on the Policy provisions from the Unit HR Head.

12) Record Keeping

The following instructions shall be followed by the members of the Internal Committee and the Disciplinary Committee in maintaining records of proceedings of their respective Committee:

- (i) The Presiding Officer of the Internal Committee or the Disciplinary Committee as the case may be, shall be responsible for ensuring that the minutes of each committee meeting and the records leading to each meeting are properly documented.
- (ii) The Internal Committee or the Disciplinary Committee, as the case may be, shall be responsible for maintaining a comprehensive, detailed and confidential record of every complaint received, including the details of dates, meetings, conciliation, withdrawal, investigations, findings, interim and/or final recommendations, and the actions implemented by Employer in response to the recommendations of the IC/DC.
- (iii) The Internal Committee or Disciplinary Committee, as the case may be, shall maintain all documents related to appeals made against the recommendations of the IC and action taken by the Employer until the final resolution of the case before the final non-appealable court of competent jurisdiction.
- (iv) The Internal Committee or Disciplinary Committee, as the case may be, shall assist AHEL in securely storing and maintaining all records pertaining to reported incidents, investigations, and resolutions for a period of at least seven years from the date of filing the report or as required by applicable law.



- (v) AHEL along with the Internal Committee and Disciplinary Committee shall draw up and implement necessary processes to ensure confidentiality of the records and proceedings related to the complaint; such processes shall include who is authorized to access, request for and receive copies of these records.
- (vi) The above record-keeping practices must comply with all applicable laws and regulations regarding privacy, data protection and employment. To elucidate further, the handling, storage, and destruction of such records must align with legal requirements and industry best practices.
- (vii) It is reiterated that strictest confidentiality must be maintained regarding any documentation prepared and/or maintained under this Policy or any information known to or accessed by the Internal Committee and AHEL, including without limitation the identities of the Complainant, Respondent, Witnesses, and any other information related to the cases, except as dictated by law and in accordance with legal advice of AHEL or as limited to be disclosed solely for the purpose of giving effect to this Policy or the matters contained therein.

13) Duties and Responsibilities of the Employer

1. AHEL shall undertake the following preventive measures to ensure that Sexual Harassment does not occur:
 - (i) Provide a safe working environment at the Workplace which shall include safety from the persons who may come into contact with Employees at the Workplace;
 - (ii) Display at any conspicuous place in the Workplace, that any and all acts of Sexual Harassment or discrimination at the Workplace are expressly prohibited; the penal consequences of Sexual Harassment or discrimination; and the order of constitution of the Internal Committee and Disciplinary Committee;
 - (iii) Organize workshops and awareness programs annually to sensitize the Employees of the provisions of the Act and annual orientation and skill building programs for the members of the Internal Committee and Disciplinary Committee;
 - (iv) Provide necessary facilities to the Internal Committee/Disciplinary Committee/CCRSRH for dealing with complaints or appeals, as the case may be, that may be initiated under this Policy and for conducting an inquiry;

Prevention, Prohibition and Redressal of Sexual Harassment and Discrimination at Workplace



- (v) Assist in securing the attendance of the Respondent and witnesses before the Internal Committee/Disciplinary Committee/CCRSH;
 - (vi) Provide all information necessary to the Internal Committee/Disciplinary Committee/CCRSH, as the case may be, in relation to a complaint;
 - (vii) Provide assistance to Employees if they choose to file a formal complaint against incidents of Sexual Harassment at the Workplace under the Indian Penal Code or any other Statute;
 - (viii) Initiate action under the Indian Penal Code or other Statute against the perpetrator in the event they are not an Employee of AHEL;
 - (ix) Treat Sexual Harassment as a misconduct under the service rules and initiate action for each misconduct; and
 - (x) Monitor the timely submission of reports by the Internal Committee or Disciplinary Committee, as the case may be.
2. AHEL shall undertake the following measures for the continuous monitoring and evaluation of this Policy to ensure its effectiveness and relevance:
- (i) The IC's Annual Report and DC's Annual Report shall be used to assess the effectiveness of the Policy and to identify areas for improvement in AHEL'S efforts to prevent and address Sexual Harassment, harassment and discrimination.
 - (ii) AHEL shall also seek regular feedback from its Employees regarding the effectiveness of the Policy, their awareness of the provisions of the Policy including the mechanisms for reporting the offenses of Sexual harassment or harassment & discrimination. This may be done through surveys, focus group discussions, or any other appropriate means. Such Employee feedback shall serve the purpose of gauging Employees' opinion on Policy's effectiveness and to identify barriers in reporting complaints or areas where Employees need more support/information.
 - (iii) AHEL must take feedback from the IC and DC members on the effectiveness of the Policy on a periodical basis and shall take best efforts to incorporate such relevant suggestions in Policy to the extent in compliance with the law.
 - (iv) AHEL undertakes to conduct periodic reviews of the POSH policy and its implementation. The review process will assess the effectiveness of current



procedures, identify any areas for improvement, and include updates needed for the Policy in response to any changes in the law, organizational structure, or workforce composition.

3. Apart from the measures mentioned above, AHEL shall:

- (i) Carry out orientation programs and seminars for the members of the Internal Committee and the Disciplinary Committee;
- (ii) Conduct capacity building and skill building programs for the members of the Internal Committee and the Disciplinary Committee

14) Confidentiality

1. AHEL understands that it is difficult for the Complainant to come forward with a complaint of Sexual Harassment and recognizes the Complainant's interest in keeping the matter confidential. AHEL wishes to inform all its Employees that the contents of a Complaint under this Policy and the records of the inquiry proceedings, recommendations and reasonings shall be kept confidential under all circumstances. Except as required by law and based on the advice of legal counsel, AHEL shall not disclose to any third party, other than the attorneys and qualified advisers of AHEL, on a need-to-know basis who agree to be bound by the terms of this Policy, information regarding the matters contemplated by this Policy.
2. The Complainant, Respondent, witnesses, persons assisting with the inquiry process and Internal Committee/Disciplinary Committee/CCRSH members (who are Employees of AHEL) would be liable for disciplinary action up to and including termination in case any of them breach the confidentiality of the inquiry process.

15) False or Malicious Complaints and Evidence

1. During the course of an inquiry being conducted by the Internal Committee/Disciplinary Committee/CCRSH, as the case may be, if it is found that the Complainant has
 - (i) made a false or malicious complaint; or
 - (ii) submitted false documents implicating the Respondent,

the Internal Committee/Disciplinary Committee/CCRSH, as the case may be, can initiate separate proceedings against the Complainant and if found guilty, the consequences include



disciplinary action including a written apology, warning, reprimand or censure, paying compensation, withholding of promotion, withholding of pay rise or increments, termination from service or undergoing counseling sessions or carrying out community service or any other disciplinary action as it may deem fit against the Complainant.

2. It is clarified that the mere inability of the Internal Committee/ Disciplinary Committee to substantiate a Complaint made to the Internal Committee/Disciplinary Committee, as the case may be, shall not amount to a false or malicious complaint.

16) No Retaliation or Victimization

AHEL will permit no employment-based retaliation against anyone who brings a complaint of Harassment & Discrimination and/or Sexual Harassment or who speaks as a witness in the investigation of a complaint of Harassment & Discrimination and/or Sexual Harassment. Any Employee indulging in retaliatory behavior shall be subjected to an investigation for misconduct and if found guilty, liable for appropriate penalties / punishment

17) Miscellaneous

1. AHEL shall in consultation with the Internal Committee and the Disciplinary Committee and the Corporate HR Department/Group Chief Human Resource Officer, periodically review the provisions of this Policy and its implementation. AHEL reserves the right to amend the provisions of this Policy, from time to time, as it deems fit, so long as the Policy is in compliance with the provisions of the Act.
2. The provisions for Internal Committee in this Policy are drafted based on the provisions in the Act and the Rules corresponding to the Act; the Internal Committee is expected to review and conduct itself in accordance with the provisions of this Act and the rules framed thereunder at all times. In the event of conflict between this Policy and the Act and the Rules framed thereunder, the provisions of the Act shall prevail.
3. If you have any questions regarding this Policy, please contact your respective Unit HR Head.
4. Additional details of this Policy are provided in Annexure-5.



18) Standards of Performance and Conduct

Like any other organizations, AHEL also requires order and discipline to succeed and to promote efficiency, productivity, and cooperation among employees. For this reason, it is helpful to identify some examples of types of conduct that are impermissible and that may therefore lead to disciplinary action, possibly including immediate discharge:

- (i) Possessing or using weapons, dangerous or unauthorized materials, liquor (unless authorized), or illicit drugs in the Workplace.
- (ii) Being impaired by alcohol, illegal drugs, or intoxicants while on AHEL property, while on duty.
- (iii) Falsifying, removing or destroying information/data of AHEL without written authorization.
- (iv) Damaging, destroying, removing without authority, or failing to return any property belonging to AHEL or its patients or customers.
- (v) Fighting, horseplay, practical jokes, or other disorderly conduct.
- (vi) Use of abusive or vulgar language.
- (vii) Engaging in any harassment or discrimination against a co-worker, customer, visitors or vendor.
- (viii) Engaging in illegal activities or conduct that poses a health or safety hazard, including smoking in non-smoking areas.
- (ix) Soliciting or accepting gratuities from customers, vendors, patients or their visitors.
- (x) Holding unauthorized gatherings on work premises or admitting unauthorized persons into the Workplace.
- (xi) Any conduct that reflects adversely on AHEL or other Employees, unless protected by law.
- (xii) Disclosing any confidential information of AHEL unless required or allowed to do so by law or by AHEL in writing.
- (xiii) Violation of any AHEL rule, practice, or policy, including any policy in this Handbook.

The above is not a comprehensive list of all types of impermissible conduct and performance, and nothing in this Policy alters the at-will employment policy of AHEL.



19) Annexures

Annexure 1 – Key points in the Complaint

The Complaint should contain the following key points:

Complaint about Harassment & Discrimination and/or Sexual Harassment (Confidential)	
Date	
Name of the Complainant	
Designation /Employee ID	
E-mail ID of the Complainant	
Date of the event	
Name of the Respondent (Accused)	
Designation/Employee ID (If known)	
E-mail ID of the Respondent (If known)	
Brief description (Attach separate sheet if necessary)	



Details of documents enclosed in evidence (if any)	
Names of witnesses proposed (if any)	
Interim Relief (if sought)	
Declaration of Truthfulness	I, [Full Name], [Age] years, [D/o; S/o _____], presently working as [Designation, Employer's name], and the Complainant above named, do hereby declare that the contents of the complaint as submitted above are true and correct to my knowledge, information and belief and no part of it is false and nothing material has been concealed therefrom.

Annexure 2 - Internal Committee

Email ID: POSHSUPPORT@apollohospitals.com

Designation	Name	Mobile
Presiding Officer		
External Member		
Member 1		
Member 2		
Member 3		
Member 4		
Member 5		

Prevention, Prohibition and Redressal of Sexual Harassment and Discrimination at Workplace



Annexure 3 - Disciplinary Committee Members

<Business Unit Name> Disciplinary Committee constitutes of the following members: email id:

Designation	Name	Email	Mobile
Presiding Officer			
Member 1			
Member 2			
Member 3			

Annexure 4 – Corporate Committee for Redressal of Sexual Harassment

Apollo's CCRSH constitutes the following members:

Name and Designation at Apollo	Email	Mobile
Ms. Malathi Manohar, Vice President – Chairman's Office	m_malathi@apollohospitals.com	+91 9840074745
Mr. Mayank Rautela, Chief Human Resources Officer	mayank_r@apollohospitals.com	+91 9819995375
Ms. Maimoona Badsha, Legal Expert	maimoonalegal@apollohospitals.com	+91 9962016424

Annexure 5 – Version Control

Version	Sections	Description of change	Written By	Approved By	Effective Date
2.0	4.4, 5.1(IV)	Common Email ID for ICC reporting	External Consultant: Rainmaker Online Training Solutions Private Limited	Mayank Rautela, Chief Human Resources Officer	April 10, 2025



Annexure 6: Process Flow Chart for Complaints before Internal Committee

