



**matrix** pharma  
corp

## PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

Policy Name	Prevention of Sexual Harassment at Workplace Policy
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## 1. Objective

**Matrix Pharmacorp Private Limited** and all its holding/subsidiary/associate/group companies/entities including Tianish Laboratories Private Limited hereinafter collectively will be referred to as (“Company/Matrix Pharma”).

Matrix Pharma maintains a **Zero Tolerance policy** towards sexual harassment in the workplace. We are committed to ensuring a safe and supportive work environment for all employees, free from any form of sexual harassment. This commitment extends to providing an effective mechanism for the redressal of complaints, enabling all employees—particularly women—to report incidents without fear of reprisal or retaliation in any form.

This policy is in alignment with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "POSH Act")**. Our POSH policy is designed not only as a means of penalizing offenders but also as a reformative approach aimed at creating awareness and fostering a respectful workplace culture.

The following core principles will guide all stakeholders in the implementation of the POSH policy, encapsulated in the acronym **CARE-**

C

**Confidentiality-** We ensure that all information related to the case such as complaint, witnesses, outcomes is handled with the utmost confidentiality

A

**Adherence to Principles of Natural Justice-** We commit to following the principles of natural justice, ensuring fairness and impartiality at all times

R

**Responsiveness-** We will treat all complaints as important and urgent, irrespective of the gender, committing to resolve every grievance promptly

E

**Empathy-** We will be sensitive to the experiences of all stakeholders, actively listening & striving to understand what they face during the process

## 2. Scope

The POSH policy applies to **all employees** of Matrix Pharma & would come into play during alleged act of sexual harassment at workplace, whether the incident has occurred during or beyond office hours, in the premises.

It also applies to individuals coming to the workplace for employment or for any other purpose whatsoever, including but not limited to officers, directors, trainees, consultants, vendors, visitors, suppliers, contract labour, agents, representatives and or any third party with whom an employee may have to interact with.

This policy extends to notional workplaces, as stated in the workplace definition in the upcoming section.

## 3. Definitions

**Employee-** Employee is a person employed at the workplace, 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, probationer, trainee, apprentice or by any other such name.

**Employer-** Refers to any person responsible for the management, supervision, and control of the workplace, including those discharging contractual obligations concerning employees.

**Aggrieved Woman-** In relation to the workplace, an aggrieved woman is any woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. This includes contractual, temporary employees, and visitors.

**Respondent-** A respondent is a person against whom a complaint of sexual harassment has been made by the aggrieved woman.

**Workplace-** Workplace includes all premises of Matrix Pharma, including the corporate offices, all branches and units (including plants & shop floor).

Workplace also extends to informal settings associated with work, such as food courts, recreational facilities, training programs, & any virtual platforms used for work. Places visited by the employee arising **out of** or **during the course of**

**employment** including official events, transportation, and accommodation provided by the employer.

**Sexual Harassment-** Sexual harassment is defined as unwanted conduct of a sexual nature and includes, but is not limited to-

**Physical Conduct-** Unwanted physical contact, advances, and explicit [sexual overtures](#)<sup>1</sup> which includes, but is not limited to following-

- Intentional touching, pinching, grabbing, brushing against another's body
- Cornering, trapping, or blocking another's pathway
- Excessively lengthy handshakes
- Any physical conduct that is unwelcome/sexually implied or oriented

**Verbal Conduct-** [Sexual innuendos](#)<sup>2</sup>, comments, jokes, or remarks about a person's body or clothing which includes, but is not limited to following-

- Making sexually suggestive comments, threats, [slurs](#)<sup>3</sup>, or [sexual repositions](#)<sup>4</sup>
- Sexual jokes or teasing, misogynistic [humour](#)<sup>5</sup>, and gender-specific jokes
- Innuendoes and [off-colour](#)<sup>6</sup> remarks
- Comments about how someone looks, especially about specific body parts
- [Catcalls](#)<sup>7</sup>, whistles, and forms of address like “honey,” “sweetheart,” etc.

**Non-Verbal Conduct-** Unwelcome gestures, and display of sexually explicit materials, which includes, but is not limited to following-

- [Leering](#)<sup>8</sup> or staring at another's body in a sexual manner
- Unwelcome display of sexually explicit pictures, pornography or any other object
- Sending or sharing sexually explicit messages or images
- Letters or notes containing sexual comments

**Quid-Pro Quo-** Situations where rejection of unwelcome sexual advances influences employment decisions which includes, but is not limited to the following-

- Any demand for sexual favours in exchange for promises related to employment
- Implied/explicit promises of preferential/differential treatment in employment
- Any implied or explicit threats about the present or future employment status

**Hostile Work Environment-** Conduct that creates an intimidating or offensive work environment.

**Virtual Sexual Harassment-** With the transition to virtual workspaces, all employees and managers are expected to maintain professionalism in virtual interactions. This includes guidelines for appropriate conduct in online meetings and communications. ([Refer to Virtual Interaction Guidelines](#))

## Virtual Interaction Guidelines

### Do's

- Employees must dress appropriately for video conferences, adhering to professional standards expected in the workplace.
- Ensure discussions remain focused on work-related topics, projects, and deliverables.

### Dont's

- Employees should avoid wearing casual clothing such as vests, shorts, or T-shirts with *suggestive phrases*<sup>9</sup> during video calls.
- Avoid Video Background with posters or any elements that may convey *suggestive content*<sup>10</sup>.
- Refrain from making jokes that could be deemed inappropriate or offensive.
- Managers should not require female colleagues to participate in one-on-one video calls if they are uncomfortable; they may opt for “audio-only” mode instead.
- Avoid scheduling late-night video calls unless it's an urgent business matter; in such cases, employees should be allowed to join in “audio-only” mode.

## Internal Complaints Committee (ICC)

The Internal Complaints Committee (ICC) shall consist of members nominated by the management, ensuring that **at least one-half of the total members are women**. The ICC will be responsible to investigate and inquire into the complaints of sexual harassment of women at the workplace.

**Composition of the ICC-** The ICC shall consist of minimum 4 members as stated below-

- A Presiding Officer, who shall be a senior level woman employee
- Two employee members who are preferably committed to women's issues/ possess experience in social work, or have legal knowledge
- One external member from a Non-Governmental Organization (NGO) or association focused on women's issues, or an individual certified with sexual

harassment. (The fee for this external member shall be determined and periodically reviewed by the management)

### **Terms of Office**

Each member of the ICC shall serve for a term of three (3) years from the date of their nomination, post which the ICC shall be re-formed.

### **Removal of Members**

The Presiding Officer or any member of the ICC may be removed for *contravening*<sup>11</sup> any provision of the Act or due to disqualifications as defined within the Act.

### **Sub-Delegation of Authority**

The ICC, under the authorization of the Board of Directors or the designated committee, may delegate authority to a sub-committee for addressing local issues at Manufacturing Units or Functional Departments within the Company.

### **Confidentiality-**

At all stages of the procedures, ICC members must be mindful of the potential impact on individual lives and careers, and hence exercise extreme caution in the disclosure of any information. ICC members must maintain confidentiality of the complaint, complainant, respondent, witnesses, conciliation, inquiry, recommendations made by ICC and the action taken by the Employer.

## **4. Procedure for Dealing with a Complaint**

### **Who can file a Complaint?**

- Any woman who has been subjected to Sexual Harassment at Workplace has the right to & is encouraged to lodge complaint with the ICC
- In case the aggrieved woman is unable to make a complaint because of physical/mental incapacity, the complaint may be filed by-
  - Her relatives or friends
  - Her co-workers
  - An officer of the State/National Commission for Women
  - Any person who has knowledge of the incident, with the written consent of the aggrieved woman
  - Her qualified psychiatrist or psychologist (in case of mental incapacity)
  - Guardian or authority under which she is receiving care (in case of mental incapacity)

- If the Complaint cannot be made in writing, the Presiding Officer or any member of the ICC will render all reasonable assistance to the aggrieved woman to make a written complaint
- In the event of demise of the aggrieved woman, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir

### **Rights of the Aggrieved Woman**

- The aggrieved woman has the right to lodge a complaint with the ICC in case of sexual harassment, even if it is against the 'employer'
- She can request, in writing, interim relief for transfer (for her / respondent) or leave, pending inquiry by the committee
- After lodging a complaint, she may request the ICC to facilitate resolving the issues through conciliation (no monetary settlement permitted)
- Make a reasonable request to be accompanied by a member, whose presence in the inquiry shall not cause any conflict of interest
- If not satisfied with the inquiry proceedings / recommendations by the ICC / implementation of the recommendations of the ICC, choose to appeal to such Statutory Body or Court or Tribunal designated by Government in this regard, within 90 days of such recommendation

### **Filing of Complaint**

- All Complaints of Sexual Harassments shall be made to the ICC. The Complaint is to be addressed to ICC at [icc@tianishpharma.com](mailto:icc@tianishpharma.com)
- If complaints of sexual harassment are submitted to colleagues, leaders, managers or HRBP's, the receiver has a duty to encourage the complainant to forward the same immediately to the ICC and maintain confidentiality of the same
- For cases where the complainant is a visitor or an employee of a vendor, sub-contractor, business partner or other, the complainant is advised to contact the ICC either through email or through the point of contact specified in the concerned contractual agreement, if any. As required, the complaint may be addressed in coordination with the employer of the complainant. (Refer to Use Case- 1)



## Use Case-1

### Landmark Judgement: Suman vs. R.K. Swamy BBDO Pvt. Ltd.

#### Background:

**Incident-** Suman, a female vendor visiting R.K. Swamy BBDO Pvt. Ltd. for a business meeting, reported that she faced inappropriate comments and unwanted advances from an employee during her visit.

**Complaint Process-** Following the incident, Suman lodged a complaint with the Internal Complaints Committee (ICC) of the company, as per their POSH policy.

**Investigation-** The ICC conducted an inquiry into Suman's complaint, interviewing both the complainant and the accused, along with any witnesses.

**Outcome-** The ICC found the allegations to be substantiated and recommended disciplinary action. This included mandatory training on workplace conduct & a formal reprimand. Additionally, R.K. Swamy BBDO was directed to implement measures to ensure a safe environment for all visitors and to reinforce their commitment to maintaining professional standards

*This incident underscores the importance of having a supportive framework for all individuals interacting with the organization, including contractors and vendors. The ICC's proactive approach should align with the legal precedents set by the above case, affirming that all individuals have the right to a safe working environment, regardless of their employment status.*

- A Complaint relating to Sexual Harassment must be made **within three (03) months from the date of the alleged offence.**
- In case of a series of events, the complaint must be made **within three (03) months from the date of the last incident.** A delay, if any, in lodging such

complaint may be accepted by the ICC, provided that the complainant submits sufficient cause for such delay, subject to a limit of another three (03) months.

- The complainant must furnish **six (06) copies** of the complaint to the ICC. The complaint must have the following-
  - A complaint must specify the details of the incident in clear language with full particulars (The complaint can be in English or any language familiar to complainant)
  - Date, time & place of incident must be clearly and unambiguously mentioned in the complaint
  - The complaint must disclose the acts committed by the respondent in clear and unambiguous terms.
  - If any specific words have been used or any gesture demonstrated by the respondent that must be explained in detail.
  - The complaint must disclose in whose presence the misconduct has been committed by the respondent so that those persons could be called as witnesses to verify the alleged incident.
  - The complaint, if possible, should also mention about the material evidence that could substantiate the allegations to enable the ICC to investigate into the same in an effective and efficient manner and reach to a just conclusion.

**Note-** *Anonymous Complaints should not be entertained*

### **ICC's Responsibility Post receiving a Complaint**

- Initial Meeting- ICC to conduct initial meetings with the complainant **within 7 days of receiving a complaint** which must include following tasks-
  - Review & record the details of the complaint to ensure clarity
  - Describe the rights of aggrieved woman to the complainant & explain the procedure that will be followed henceforth
  - Address any questions or concerns the complainant may have
  - Determine any interim measures needed for the safety and well-being of the complainant
- Sharing of Complaint- A copy of the complaint will be provided to the respondent **within seven (7) days** of receipt
- Response from Respondent- The respondent must submit a statement of defense **within ten (10) working days**, accompanied by their own list of documents, evidence, and witness information.

## Interim Measures

- If the complainant makes a request in writing, the ICC may recommend the employer to take any of the following measures-
  - Transferring either the complainant or the respondent to a different workplace to minimize interaction.
  - Granting leave to the complainant for a period not exceeding three (3) months
- The ICC may also recommend that the respondent be restrained from assessing the work performance of the complainant, including writing her performance evaluations, and assigning these responsibilities to another manager
- The ICC may suggest any other relief deemed appropriate. The employer is required to act upon these recommendations and will provide a written report of the actions taken to the ICC.

## Conciliation

The ICC may, at the request of the aggrieved woman, take steps to settle the matter between her and the respondent through conciliation before initiating a formal inquiry. [\(Refer to Use Case- 2\)](#)

**Note:** No monetary settlement shall be made as a basis for conciliation.

In the scenario when a settlement is reached, then ICC should-

- Document the terms of the settlement & forward it to the employer for further action as specified in the recommendations
- The ICC shall provide copies of the recorded settlement to both the aggrieved woman & the respondent to ensure transparency

In the scenario when a settlement is reached, NO further Inquiry is required.

## Use Case-2

### Use Case: Priya vs. Tech Innovations Pvt. Ltd.

#### Background:

**Incident-** Priya, a female project consultant, visited Tech Innovations Pvt. Ltd. for a project collaboration meeting. During her visit, she felt uncomfortable due to what she perceived as inappropriate comments made by a senior project manager, Rajesh.

**Complaint Process-** After the meeting, Priya filed a formal complaint with the ICC of Tech Innovations, citing the comments made by Rajesh as harassment.

**Investigation-** The ICC promptly conducted the first meeting with Priya in 2 days of filling the complaint. A copy of complaint was sent to Rajesh promptly. Rajesh was given the chance to explain himself. Rajesh mentioned that his comments were intended as light-hearted banter and that he had no intention of making Priya uncomfortable.

Recognizing the potential for misunderstanding, the ICC proposed a conciliation process to both parties. During the conciliation meetings, facilitated by a neutral member of the ICC, both Priya and Rajesh were given the opportunity to express their views.

Rajesh expressed regret for how his comments were perceived & both parties agreed & acknowledged the misunderstanding.

**Outcome-** Upon Mutual agreement, the case was closed. Rajesh committed to being more mindful of his language in the future, while Priya felt reassured about her working relationship with him moving forward. Both agreed to participate in a workshop on workplace communication to foster a better understanding of professional boundaries.

*This case highlights the importance of effective communication and understanding in resolving workplace disputes. It demonstrates how conciliation can serve as a valuable tool for addressing misunderstandings without escalating tensions or leading to formal disciplinary actions*

## Inquiry Process

Where no mutually agreeable settlement can be reached during the conciliation process, the ICC shall proceed with the inquiry Process.

### Initial Phase of Inquiry

- The ICC will fix dates & location for the inquiry
- At least three members of the ICC, including the Presiding Officer, must be present during the inquiry proceedings
- Neither party (Complainant / Respondent) is allowed to be represented by a legal practitioner during the inquiry
- Commencement of inquiry begins with the ICC explaining the inquiry procedure to both the complainant and respondent
- The ICC shall administer an oath / affirmation to both the complainant & respondent before starting the Inquiry
- Both parties will be given chance to present their evidence & witnesses
- The ICC will hear & document the statement of accusations, relevant facts from both the parties including any admissions or confessions by the respondent
- ICC may evaluate the witness credibility and can recall witnesses if needed
- The respondent will have the opportunity to cross-examine the complainant and her witnesses, while the complainant can also cross-examine the respondent and his witnesses
- Although the primary focus is on the respondent, the ICC may include adverse remarks about connected persons for further action by the Employer.
- The inquiry must be completed **within ninety (90) days**, adhering to the Principles of Natural Justice
- All statements must be signed by the concerned party, and both the complainant and respondent will receive a copy of the findings at the end of the proceedings
- **Suspension pending Inquiry** -If deemed necessary, the ICC may recommend the suspension of the respondent's services as an interim measure while the complaint is being addressed. Upon receiving such a recommendation, the Employer may consider suspending the respondent's services until the inquiry is completed and the final report is submitted. The suspension order will include the following details-
  - Reasons for Suspension- Clear justification for the suspension
  - Effective Date- The date and time from which the suspension will commence
  - Approximate Duration- An estimate of the timescale for the suspension period.
  - Information on the amount of subsistence allowance that will be paid to the respondent during the suspension.

Post the Initial phase of the Inquiry, the following steps & outcomes will occur-

- The ICC will assess all evidence & the statements of both the complainant and respondent. There can be 3 possible scenarios here-
  - **Allegations against Respondent proven-** If the ICC finds sufficient evidence supporting the complainant's claims, it will recommend appropriate disciplinary action against the respondent- 'The severity of the disciplinary actions must be directly proportional to the gravity of the misconduct'. Disciplinary actions typically include-
    - \* Written apology from the respondent
    - \* Warning letter
    - \* Reprimand or *censure*<sup>12</sup>
    - \* Withholding of promotion
    - \* Withholding of pay rise or increments
    - \* Deduction from salary
    - \* Termination of employment
    - \* Financial penalty (considering mental, physical trauma, loss of career opportunity, medical expenses) either as a lump sum or in instalments
    - \* Requirement to undergo counselling sessions
    - \* Transfer to another workplace
  - **Allegations against Respondent not proven-** If the ICC finds that the allegations against the Respondent are not substantiated, it will prepare a report indicating that no further action is required. A copy of this report will be provided to both the respondent and the complainant to ensure transparency.
  - **False or Malicious Complaint-** If the ICC determines that the complainant filed a false or malicious complaint, it may recommend disciplinary action against the complainant as per the organization's service rules. Failure to provide sufficient information or evidence shall not be considered as a malicious complaint. (*Refer to Use Case- 3*)

## Use Case-3

### Use Case: Ravi vs. Bright Minds Biosciences Pvt. Ltd.

#### Background:

**Incident-** Ravi, a male research scientist at Bright Minds Biosciences Pvt. Ltd., was accused of sexual harassment by a female colleague, Neha. The allegations arose after a team meeting where Ravi provided critical feedback on a joint research project.

**Complaint Process-** Following the incident, Neha lodged a formal complaint with the ICC of Bright Minds Biosciences. She alleged that Ravi's remarks were inappropriate and made her feel uncomfortable in the workplace.

**Investigation-** The ICC quickly initiated an investigation into Neha's allegations. They interviewed both Ravi and Neha, along with several witnesses from the research team who were present during the meeting. Ravi asserted that his feedback was intended to enhance the project and had no ill intentions.

The ICC reviewed emails, meeting notes, and witness testimonies. It became evident that Neha's accusations were driven by personal animosity rather than actual misconduct. Witnesses confirmed that Ravi's feedback was constructive and professional, indicating that Neha had fabricated her claims out of personal grievance stemming from professional jealousy.

**Outcome-** The ICC concluded that the allegations against Ravi were false and constituted malicious claims. They recommended stern disciplinary action against Neha for filing a baseless complaint, which included warning letter, written apology & withholding of increments until employment training on workplace ethics is fully completed.

*This case highlights the critical importance of addressing false allegations of harassment in the workplace. It reinforces the message that while it is essential to take all complaints seriously, it is equally important to protect employees from malicious claims that can damage reputations and careers as well as social stigma.*

- Post Inquiry, the ICC will compile a comprehensive report that includes-
  - A summary of the allegations
  - Statements recorded of the complainant & respondent
  - Evidence and witness testimonies
  - Findings regarding the validity of the complaint
  - Proposed disciplinary actions & recommendations
- Both Parties will be provided with a copy of the ICC's findings & recommendations
- The employer will implement the ICC's recommendations based on the findings.

### **Appeal Process**

If either party is dissatisfied with the findings or the implementation of the recommendations, they may appeal to the designated appellate authority within a specified timeframe of **ninety (90) days**.

### **Documentation and Confidentiality**

All documents, findings, reports will be kept confidential, ensuring that sensitive information is protected throughout the process.

### **Inclusive Harassment Prevention Policy**

The POSH Act is inherently **proscribing**<sup>13</sup> in nature, meaning it explicitly prohibits sexual harassment in all its forms. At Matrix Pharma, we uphold the principles of this legislation by ensuring that **any instances of sexual harassment, regardless of the gender of the victim or perpetrator**—including males and individuals from other gender cohorts—are addressed with the utmost seriousness by our Internal Complaints Committee (ICC). We are committed to fostering a safe and respectful workplace for everyone, and we will take appropriate action to investigate and resolve all reported incidents, promoting an environment free from harassment for all employees. (*Refer to Use Case- 4*)



## Use Case-4

### Use case: Arjun vs. PharmaTime Solutions Pvt. Ltd.

#### Background:

**Incident-** Arjun, a male sales executive at PharmaTime Solutions Pvt. Ltd., was subjected to sexual harassment by a female manager, Meera. During a business trip, Meera made inappropriate comments and unwanted advances towards Arjun, creating a hostile work environment.

**Complaint Process-** Disturbed by the incident, Arjun decided to file a formal complaint with the ICC of PharmaTime. He detailed the harassment he faced, emphasizing how it affected his mental health and work performance.

**Investigation-** The ICC promptly initiated an Inquiry into Arjun's allegations. They interviewed both Arjun and Meera, along with several colleagues who were present during the trip. Witnesses corroborated Arjun's claims, stating that Meera's behaviour was inappropriate and unprofessional. The ICC found substantial evidence supporting Arjun's claims.

**Outcome-** The ICC concluded that Meera's actions constituted serious misconduct. They recommended disciplinary action, which included suspension without pay, financial penalty & mandatory training on workplace harassment policies.

*This case reinforces that harassment can occur in any direction with anyone & at any place and that the organizations must take all complaints seriously.*

### Modification and Review of the Policy

The company retains the right to modify or review the provisions of this Policy to ensure compliance with applicable legal requirements, internal policies, or any other necessary revisions.

Any changes or modifications deemed necessary will be communicated to employees in a timely manner.

## GLOSSARY

### 1. Sexual Overtures

Unwanted actions or words that suggest sexual interest. This can include touching inappropriately, sexual comments or body language that suggests attraction.

*Example: A colleague continuously making comments about someone's looks in a flirtatious way, even after being asked to stop.*

### 2. Sexual Innuendos

Comments that suggest something sexual without directly saying it. These remarks often rely on double meanings.

*Example: Saying "I like your outfit; it really shows off your best features" in a way that implies something inappropriate.*

### 3. Slurs

Offensive or insulting remarks that are often targeted at someone's gender, race, or other personal characteristics. In sexual harassment, slurs may refer to derogatory comments about someone's sexuality or gender.

*Example: Calling someone a derogatory name related to their gender or sexual orientation.*

### 4. Sexual Repositions

Explicit or implied suggestions for sexual acts, typically made in an inappropriate manner. This could involve offering or demanding sexual favors in exchange for something.

*Example: A manager suggesting that an employee will get a promotion if they go on a date with them.*

### 5. Misogynistic Humour

Jokes or comments that degrade or belittle women. These often reinforce harmful stereotypes about women.

*Example: Making a joke that women are bad drivers or can't do certain jobs.*

### 6. Off-Colour Remarks

Comments that are inappropriate, crude, or offensive, often related to sex or other sensitive topics. These remarks are typically made to shock or discomfort others.

*Example: Telling a joke that involves sexual content that makes others feel uncomfortable.*

### 7. Catcalls

Verbal comments or sounds, usually made to someone in a public space, that are sexually suggestive or objectifying. These are often unsolicited and make the recipient feel harassed.

*Example: Whistling at someone or shouting comments like "Hey, baby!" or "Looking good!" in a way that makes them feel uncomfortable.*

#### **8. Leering**

Staring at someone in a way that suggests sexual interest, often making the person feel uncomfortable or objectified.

*Example: A colleague staring at someone's body for a long time during a meeting, making them feel uneasy.*

#### **9. Suggestive Phrases**

Words or phrases that imply something sexual, even though they don't directly state it. These are often said in a way that makes the other person feel uncomfortable or pressured.

*Example: Saying "Maybe we could go out for a drink sometime and see where things go" in a flirtatious tone.*

#### **10. Suggestive Content**

Images, messages, or other media that contain sexual or inappropriate material. This could include anything from explicit images to subtle sexual references.

*Example: Sending a colleague an image of a sexually suggestive meme or text message.*

#### **11. Contravening**

To go against or violate rules or laws. In this case, it means breaking the company's sexual harassment policy.

*Example: Making unwanted sexual advances at a colleague, which goes against the workplace policy on harassment.*

#### **12. Reprimand or Censure**

A formal warning or disapproval of someone's actions. In the case of sexual harassment, this means an official statement that someone's behaviour was unacceptable.

*Example: A manager receives a reprimand after making inappropriate sexual jokes during a meeting.*

#### **13. Proscribing**

Proscribing in nature means that the policy is explicitly prohibitive. It forbids sexual harassment & ensures that all employees, regardless of gender, are protected from harassment at the workplace. This means that any act of sexual harassment—whether it is committed against a woman, man, or anyone of another gender—will be treated with the same seriousness and addressed accordingly.

## ANNEXURE

### Frequently Asked Questions (FAQ's)

➤ **What is sexual harassment?**

Sexual harassment is defined as any unwelcome acts or behaviours such as physical contact and sexual advances, requests for sexual favors, sexually coloured remarks, showing pornography, and other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

➤ **When is conduct considered unwelcome or harassing?**

Conduct is considered unwelcome when it includes verbal or physical advances that interfere with an individual's work performance or create an intimidating, hostile, or offensive work environment.

➤ **What is not considered sexual harassment?**

Occasional compliments of a socially acceptable nature are not considered sexual harassment. Only behaviours that are unwelcome and personally offensive are included.

➤ **What are the responsibilities of employees regarding sexual harassment?**

Employees are expected to refrain from engaging in sexual harassment and to report any incidents promptly to the ICC at an immediate basis.

➤ **What happens after an employee reports an incident of sexual harassment?**

The organization will conduct a prompt and impartial investigation while respecting the confidentiality of all parties involved. Appropriate disciplinary action will follow if the allegations are substantiated.

➤ **Can employees report sexual harassment anonymously?**

While anonymous reports are noted for monitoring, formal investigations require a signed complaint with detailed particulars.

➤ **Does the POSH Policy cover harassment against all genders?**

Yes, the POSH Policy at Matrix Pharma is inclusive and addresses sexual harassment against all individuals, regardless of gender. This includes men and other gender cohorts.

➤ **What protections are available to individuals who report sexual harassment?**

Retaliation against those who report sexual harassment or act as witnesses is strictly prohibited and will result in disciplinary action against the offender.

➤ **What support services are available to victims of sexual harassment?**

The company offers access to counselling services and other resources to help victims cope with emotional and psychological effects.

➤ **What training programs are in place to prevent sexual harassment?**

Regular training sessions are conducted to educate employees about the company's policies and procedures regarding sexual harassment.

➤ **How does the organization ensure confidentiality during the investigation process?**

The company takes measures to maintain the confidentiality of all parties involved in the investigation while conducting a thorough inquiry. The complainant, respondent and witnesses are instructed not to disclose or discuss ICC proceedings with colleagues, family members and outsiders.

➤ **What are the consequences of false accusations of sexual harassment?**

Filing a false or malicious complaint is treated as serious misconduct and may result in disciplinary action, including termination of employment.

➤ **Is the policy only for working women at our company?**

No, the policy applies to all women, including visitors, freelancers, consultants, or customers, who may be harassed at the workplace.

➤ **What if an employee of our company is accused of sexual harassment by a female employee of another company?**

Such incidents will be investigated by the Internal Complaints Committee and treated as misconduct under the company's disciplinary policy.

➤ **What should an employee keep in mind while filing a complaint?**

Complaints must be made within three months of the incident and should include details such as the name of the alleged person, date, place, and a detailed narrative of the incident.

➤ **Will filing a complaint lead to office gossip?**

Yes, both parties have a right to confidentiality, meaning that all relevant information must not be disclosed publicly.

➤ **How can employees get clarification on the policy?**

Employees can contact members of the Internal Complaints Committee or the Human Resources Department for any information about the policy.

➤ **What should a complainant do if they want to bring witnesses during the investigation?**

They can request the Internal Complaints Committee to facilitate bringing in witnesses or to obtain relevant management records for the investigation.

➤ **Should the employee share details of the incident with colleagues?**

No, details should only be shared with the Internal Complaints Committee or HR, as discussing the matter could interfere with the investigation.

➤ **What if an employee from my organization is accused of harassment by an employee from another company/vendor?**

This will be investigated by the Internal Complaints Committee of the respective organization and treated as misconduct according to the whistleblower policy.

➤ **How can I file a complaint?**

Complaints should be addressed to the ICC at [icc@tianishpharma.com](mailto:icc@tianishpharma.com) and must include all necessary details as outlined in the policy.

➤ **What should an employee do if they experience harassment but are not a woman?**

Any employee, regardless of gender, is encouraged to report incidents of harassment to the ICC. The process will be the same, ensuring confidentiality and support throughout the investigation.

➤ **How does the Internal Complaints Committee (ICC) handle complaints from non-female employees**

The ICC is committed to addressing all complaints of sexual harassment, ensuring a fair and impartial investigation process for individuals of any gender.