

## Prevention of Sexual Harassment Policy

| HR Policies – Process – Procedures                                                                                                          |                                                      |            |           |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------|-----------|
|  <p><b>LAURUS Labs</b><br/>Chemistry for Better Living</p> | <p><b>Prevention of Sexual Harassment Policy</b></p> | Policy No. | LL/HR/008 |
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### 1. Objective:

- 1.1 Laurus Labs is committed to a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional environment, free of violence, harassment, exploitation, and intimidation. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of gender.
- 1.2 Every Associate should be aware that while the Company is committed to the right to freedom of expression and association, it strongly supports gender equality and opposes any form of gender discrimination and violence. Therefore, Laurus Labs expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.
- 1.3 As required by applicable law in India, including without limitation, "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act)", LAURUS LABS LIMITED including it's wholly owned subsidiaries i.e. LAURUS SYTHESIS PRIVATE LIMITED &

## **Prevention of Sexual Harassment Policy**

SRIAM LABS PRIVATE LIMITED (together referred to as the "Company") has framed this Policy on the Prevention of Sexual Harassment ("POSH Policy").

### **2. Applicability:**

This POSH Policy is applicable to all employees of the Company, present and future, male and female, including persons employed 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 Company, 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, trainees, apprentices or any employee called by any other such name (collectively referred to herein as "Associate(s)"). This policy also covers all contract men / women, visitors & vendors.

- 2.1 Sexual harassment is a form of misconduct that undermines the employment relationship. No Associate should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct. Sexual harassment refers to behavior that is not welcome, that is personally offensive, and that debilitates morale and, therefore, interferes with work effectiveness.
- 2.2 Accordingly, this POSH policy is to prohibit harassment of an Associate by another Associate or any visitor on the basis of sex. The purpose of this policy is not to regulate our employees' personal morality. It is to ensure that, in the workplace, no Associate harasses another Associate on the basis of sex.
- 2.3 While it is not easy to define precisely what sexual harassment is, it certainly includes the following behavior, but this is not the exhaustive list.

#### **Non-Verbal**

- Making derogatory gestures / giving sexually suggestive looks
- Staring / leering
- Invading personal space
- Pin-ups
- Offensive publications
- Sending suggestive letters, memos, notes, or e-mails
- Unsolicited and unwanted gifts
- Displaying electronic content of sexual nature - images or videos, pornography, with co-workers

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### **Verbal**

- Language of a suggestive or explicit nature
  - Unwanted propositions
  - Jokes of a sexual or explicit nature
  - Questions or comments of a personal nature
  - Making sexual comments about appearance, clothing, or body parts
  - Making derogatory / sex-based / gender-based comments
  - Persistently asking someone for dates
  - Addressing someone as sexy, dear, sweat-heart, babe, honey etc.
  - Making sexual innuendoes or stories
  - Requesting or demanding sexual favors from someone
- Physical**
- Deliberate body contact
  - Indecent exposure
  - Groping / fondling / kissing
  - Coerced sexual contact
  - Blocking someone's path to make a sexual advance
  - Stalking someone

- 2.4 The Company will take all necessary and reasonable steps to prevent and ensure that no Associate is subject to sexual harassment by any third party, during the course of employment. Where any such Sexual Harassment occurs, the employer shall take all necessary steps to assist the aggrieved woman to redress the act of Sexual harassment. No Associate of the Company shall sexually harass an outsider who visits the Company.

### **3. Internal Complaints Committee (ICC):**

- 3.1 An Internal Complaints Committee has been constituted by the Company as required by applicable law, which would deal with all formal complaints and allegations of Sexual Harassment.
- 3.2 The constitution of the Committee with the contact details of the members of the Committee are notified by the Company as follows. The said details are displayed, from time to time, on the notice boards(s) at each of the Company's offices/premises, and/or its internal website. The Company will also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Committee, or to the contact details of the members of the Committee.

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### **Internal**

Ms. Soumya Chava - Presiding Officer

Ms. Sandhya Rani K- Corporate Office

Mr. Srinivas Simhadri - Parawada, Visakhapatnam

Mr. Girish Kottapalli - Atchutapuram, Visakhapatnam

Ms. Siva Lakshmi A - R&D

### **SRIAM Member for Sriam meetings**

Mr. Srinivasa Rao Suryadevara - Hyderabad

### **LSPL Member for LSPL meetings**

Mr. Lakshmi Pathi Rao Magapu - Visakhapatnam

### **External**

MR. NAGESWARA RAO JARUGULA, Consultant

- 3.3 Disqualification, resignation or termination of membership – ICC member (including the Presiding Officer) shall be removed from the Committee / disqualified by the Company, if she/he:
- Contravenes Section 16 of the POSH Act.
  - Has been convicted for an offence or if an inquiry into an offence under any extant law is pending against her/him.
  - Is found guilty in any disciplinary proceedings or if a disciplinary proceeding is pending against her/him.
  - Has so abused her/his position as a member of the Committee as to render her/his continuance in office prejudicial to public interest.
  - Ceases to be an employee of the company.
- 3.4 Term - An ICC member shall not hold office for more than 3 years. However, the Company may temporarily extend the term of any member of the Committee in order to dispose of any pending Complaint.
- 3.5 A quorum of 3 members is required to be present for an inquiry to take place. The quorum shall include the Presiding Officer and at least two members, with at least half of such persons being women. The decisions of the Committee shall be decided by the majority vote and in cases of division of votes equally, the Presiding Officer shall have a casting vote.

### 4. Grievance Handling Procedure:

#### 4.1 Redressal Procedure

- Any Associate who has experienced or is subjected to any act of Sexual harassment can directly write an email to [supportme@lauruslabs.com](mailto:supportme@lauruslabs.com) (access by Presiding Officer) or can submit a complaint to any of the ICC members.
- Any Associate may share complaint with supporting evidence and witness details of the alleged incident to any member of the ICC within 90 days of occurrence of the incidence or the last act. In addition, an Associate can talk with supervisor or a representative from HR. Any of these sources of intake will ensure that the Associate's complaint is promptly brought to the notice of the Committee.
- Where an aggrieved Associate is unable to make a complaint on account of her physical or mental incapacity or any other reason, a complaint may be filed by:
  - a. Her relative or friend; or
  - b. Her co-worker; or
  - c. Any person who has knowledge of the incident, with the written consent of the aggrieved Associate.
- Where the aggrieved Associate is dead, a complaint may be filed by any person who has knowledge of the incident with the written consent of the legal heir of the aggrieved Associate.
- ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding 90 days, if it is satisfied that the circumstances were such which prevented the aggrieved Associate from filing a complaint in 90 days.
- The complaint may be oral or in writing. If the complaint is oral, the ICC member shall record the same in writing, in detail, and have the contents confirmed by the complainant.
- The complainant is ordinarily required to submit 6 copies of the complaint along with supporting documents and the names and addresses of the witnesses to ICC.
- ICC will maintain a register to endorse the complaint received and

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keep the contents confidential, if it is so desired, except to use the same for discrete investigation.

- On the request of the aggrieved Associate ICC can enable conciliation with the accused.
- If the aggrieved Associate does not want conciliation, ICC shall begin the enquiry.
- ICC will hold a meeting within five days from receipt of the complaint but no later than a week in any case.
- At the first meeting the ICC members shall hear the Complaint and record the allegations.
- If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady ICC member shall meet and record the statement.
- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- Notwithstanding anything contained in any other law for the time being in force the onus of proving the innocence shall be on the accused and the victim shall have the right to lead evidence in rebuttal.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the ICC member.

### **4.2 Enquiry Process**

- The ICC shall immediately i.e. within a week proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The ICC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him an opportunity to submit a written explanation if he so desires within 7 days of receipt of the same.

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- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the ICC the names of witness/es whom they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the ICC, she shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.
- The ICC shall call upon all witnesses mentioned by both the parties.
- The ICC shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- The ICC shall complete the "Enquiry" within a month's period but not beyond three months after receiving the complaint and communicate its findings and its recommendations for action to the Head – HR/Management team.
- The report of the ICC shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- The Head – HR will direct appropriate action in accordance with the recommendation proposed by the ICC within a month's time.
- The ICC shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

### **4.3 Interim Measures**

- During the pendency of the enquiry, on a written request made by the aggrieved Associate, ICC shall be empowered to recommend to the Company and the Company shall implement any of the following:
  - 1) The transfer of aggrieved Associate or the alleged accused to any other workplace;
  - 2) The grant of leave to the aggrieved Associate up to a period of three months;

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- 3) Restrain the alleged accused from reporting on the work performance of the aggrieved Associate or writing the confidential report of the aggrieved Associate and assign the same to another officer of the Company;
  - 4) The grant of any such other relief to the aggrieved Associate; as may be prescribed or permitted.
- Any such leave granted to the aggrieved Associate shall be in addition to the leave she would be otherwise entitled to under applicable law.
  - The Company reserves the right to require the alleged accused to take indefinite administrative leave (with payment of applicable salary) immediately from the time of receipt of a formal complaint of sexual harassment until the ICC has concluded its investigation. This is to ensure that there is no retaliation against the alleged accused by other employees and/or retaliation by the alleged accused against the complainant/other employees. Any such decision will be communicated in writing to the alleged accused by the ICC or its designee in writing. The Company reserves the right to require the alleged accused to work from an alternate company location during the enquiry.

### **4.4 Other points for consideration / support from Management and Human Resource**

- The Committee may recommend to the Head – HR, action which may include transfer or any of the other appropriate disciplinary action.
- The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Laurus shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In case an incidence happens at another location/organization where the complainant had visited for official work, Complainant can choose to file complaint at the company or the location of the incidence. The company's ICC with help the complainant in either situation to file her complaint and take action under this policy.
- It is also expressly prohibited for any person to retaliate against a person who brings sexual harassment charges or assists in investigating charges. Retaliation is a violation of this policy and may result in initiating disciplinary action. No person will be discriminated against, or discharged, because of bringing or assisting in the investigation of a complaint of sexual harassment.

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- To create healthy, safe and comfortable work environment for employees, Laurus encourages to design see-through common workspace and cabins henceforth.

### **4.5 Confidentiality**

- All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.
- All enquiries and/or complaints will be investigated as quickly as possible. Any investigation will be conducted in a confidential manner as is compatible with a thorough investigation of the complaint.
- Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are levelled, the company is committed to maintain confidentiality in relation to such complaints and the resultant enquiry.

### **4.6 Malicious or false complaint**

- Any person found to have knowingly made false complaints of sexual harassment will be subject to disciplinary action, including termination of employment.

### **4.7 Disciplinary Action**

- Disciplinary action will be initiated against an Associate found to be guilty of the charges levelled against him/her, including reprimands, suspension or termination of employment besides initiating of any other legal action as per applicable laws.

### **4.8 Criminal Proceedings**

- Where the conduct of an Associate amounts to a specific offence under the IPC or under any other law in force, the Company shall provide assistance to an aggrieved Associate if the Associate chooses to file a complaint in relation to any such offence. The Company will further comply with any requirements in relation to external reporting of an IPC offence as may be stipulated by applicable law.

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### Power to Amend:

The management may at its discretion amend or withdraw any or all of the above provisions of this policy at any time with/without notice.

| Revision History | Date of Effective |
|------------------|-------------------|
| First Issue      | 30/06/2016        |
| Second Issue     | 01/07/2019        |
| Third Issue      | 07/04/2021        |
| Fourth Issue     | 01/01/2024        |
| Fifth Issue      | 26/06/2024        |
| Sixth Issue      | 01/01/2026        |

Approved by:

|                 |                               |                                                                                      |
|-----------------|-------------------------------|--------------------------------------------------------------------------------------|
| C Narasimha Rao | Executive Vice President - HR |  |
| Name            | Designation                   | Signature                                                                            |