

Prevention of Sexual Harassment Policy (POSH)

Revision Details

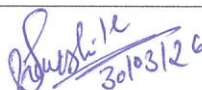
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1. Objective

Farmson Basic Drugs Pvt. Ltd. is committed to a work environment in which all individuals are treated with respect & dignity.

The Company has zero tolerance attitude towards any form of harassment, threats, insults, unlawful discrimination, and other unprofessional conduct within the Company and expects the employees to adopt a similar attitude.

This Prevention of Sexual Harassment Policy (“POSH Policy”) is formulated in terms of the guidelines prescribed in the “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” (the “POSH Act”) and the principles of natural justice.

While this POSH Policy sets forth the Company’s goals of promoting a workplace that is free of sexual harassment, the POSH Policy is not designed or intended to limit the Company’s authority to discipline or take remedial action for workplace conduct which the Company deems unacceptable, regardless of whether such conduct satisfies the definition of sexual harassment.

While this Policy sets out a grievance mechanism to resolve any complaint of Sexual Harassment, it is expected that all employees demonstrate highest level of professional conduct in the course of their employment with the Company. All individuals must act responsibly and with a complete consciousness about the consequences of their actions on the other members.

2. Scope

This POSH Policy applies to every person engaged with the FARMSON for any work whatsoever, on a regular, contract, trainees, apprentices, probationer, and even a visitor.

3. Definitions

- a) **“Aggrieved Woman”** means in relation to a workplace, a woman of any age, employed in the Company directly or through contractor who alleges to have been subject to any act of sexual harassment by the respondent.
- b) **“Employee”** means a person employed at any workplace of the Company for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including contractor, with or, without 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- c) **“Complaint”** means Any complaint in writing made by the Aggrieved Woman Employee or any other person on her behalf relating to Sexual harassment.
- d) **“Sexual Harassment”** includes any one or more “unwelcome” acts or behaviour (whether directly or by implication) towards any Woman Employee namely:
 - 1) Physical contact and sexual advances such as pinching, patting, rubbing, or purposefully brushing up against another person;
 - 2) Staring in a sexually suggestive or offensive manner, or whistling;

- 3) Demand or request for sexual favors;
- 4) Making or using derogatory comments, slurs, or jokes of a sexual nature, verbal sexual advances or propositions, graphic commentaries about an individual's body, sexually degrading words used to describe an individual;
- 5) Making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, posters, calendars or computer screens or pornography;
- 6) Inquiries about someone's sexual history or their sexual orientation;
- 7) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- 8) Sending suggestive or obscene letters, notes, chats, electronic messages;
- 9) Wearing inappropriate clothes for a video call;
- 10) Scheduling video calls at odd hours without a reasonable cause; or
- 11) Persistently calling or messaging a person at odd hours etc

In addition to the above, any of the following circumstances, if it occurs in relation to any act or behaviour of sexual harassment may amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in her/his employment;
 - b) Implied or explicit threat of detrimental treatment in her/his employment;
 - c) Implied or explicit threat about her/his present or future employment status;
 - d) Interference with her/his work or creating an intimidating or offensive or hostile work environment for her/his; or
 - e) Humiliating treatment likely to affect her/his health or safety.
- e) **“Witness”** means a person (of any gender) who personally has seen or observed the Complainant experiencing Sexual Harassment or who has knowledge about such an incident.
- f) **“Workplace”** shall include any place of work i.e. the head office / corporate office or any branch office and it shall also include any place where the Complainant or the Respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with the Company, including transportation provided for undertaking such a journey or the place from where the employees are working remotely.

The above-mentioned definitions are provided in this Policy for the ease of understanding and are not exhaustive in nature. Upon the receipt of any complaint, the ICC will first analyze whether it amounts to a complaint of ‘sexual harassment’ and whether it has occurred at the ‘workplace’ as is defined more specifically in the POSH Act.

The ICC’s decision on these matters will be final.

4. The Internal Committee

As per guidelines set out in the POSH Act, an Internal - Committee (“IC”) has been constituted for the Company, and will be responsible to carry out the functions and obligations under this POSH Policy.

The present constitution of the IC for accepting complains from Women employees under PoSH Act, 2013 from 1 Jan 2026 onwards for a period of one (1) year is as follows:

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S. No	Name of IC Committee Members	Designation	Contact Details
1	Sheela Nair	Chairperson / Presiding Officer	Email : rmpurchase@farmson.com
2	Shubhangi Mhatre	Member	Email : pharma_shubhangi@farmson.com
3	Reeja Thomas	Member	Email : qc1-u6@farmson.com
4	Varsha Pandya	Member	Email : qc2-u2@farmson.com
5	Kavita Shukla	Member	Email : kavita.shukla@farmson.com
6	Sudhesh Mishra	Member	Email : samishra@farmson.com
7	Sedhu Madhavan	Member	Email : sedhumadhavan@farmson.com
8	Shilpa Dave	External Member	Email : shilpapardeshi2017@gmail.com

5. Complaint Mechanism

- The Complainant who believes that she/he has experienced or subjected or observed Sexual Harassment shall report the incident immediately to the IC or to the management of the Company. Such a complaint must be filed within three (3) months from the incident and in case of series of incidents, within a period of three (3) months from the date of the last incident, in the prescribed format in **Annex A**.
- If any complaint is filed after these given timelines, the IC may refuse to entertain the same. The IC upon a written application made to it and if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the prescribed period, may extend the time limit for making the complaint for further three (3) months from the expiry of the initial timelines.
- The Complainant shall submit all necessary supporting documents and the names and addresses of the witnesses while submitting any Complaint to the ICC.
- Where such complaint cannot be made in writing, the Presiding Officer or any Member of the ICC or shall render all reasonable assistance to the Complainant for making the Complaint in writing.
- If the Complainant is unable to make a complaint because of his/her physical or mental incapacity, a complaint may be filed by anyone of the below state person(s), provided that such person is not a legal practitioner:
 - Any legal heir
 - Any relative or friend;
 - Any co-worker;
 - An officer of the National Commission for Women or State's Women Commission;
 - A special educator;
 - A qualified psychiatrist or psychologist;

- (vii) The guardian or authority under whose care the Complainant is receiving treatment or care;
- (viii) Any person who has knowledge of the incident, with the written consent of the Complainant.

In case the Complainant is dead, a complaint may be filed by his/her legal heir or any person who has knowledge of the incident, with the written consent of the Complainant's legal heir.

6. Inquiry into the Complaint:

- a. The Company promises to promptly and thoroughly investigate all reports of Sexual Harassment as discreetly and confidentially as possible. However, investigation of such complaint will generally require disclosure to the Respondent.
- b. The objective of the POSH Policy is to conduct a thorough investigation, to determine whether Sexual Harassment has occurred and to eliminate any hostile or offensive working condition and decide actions to take against the Respondent.
- c. The IC shall make an inquiry into the complaint in accordance with the principles of natural justice and in compliance with the applicable law.
- d. On receipt of the complaint, the IC shall send one copy of the complaint to the Respondent within a period of seven (7) working days from the receipt of the complaint.
- e. The Respondent shall then file his/her reply to the complaint along with the list of documents and names and addresses of the witnesses within a period of ten (10) working days from the date of receipt of the copy of the complaint from ICC.
- f. The ICC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision by giving fifteen (15) days of written notice to the Complainant and the Respondent if the Complainant and/or Respondent fails to present himself or herself for three (3) consecutive proceedings.
- g. The Complainant or Respondent shall not be allowed to bring in any legal practitioner to represent them in the proceedings before the IC.
- h. A complaint will be resolved within three (3) months from receipt of the complaint by the ICC. The IC will record its decisions and recommendations as per the format given under Exhibit B, and accordingly, inform the same to the Complainant and the Respondent.
 - i. For making an inquiry under the POSH Act, the IC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908, namely:
 - ii. Summoning and enforcing the attendance of any person and examining him on oath;
 - iii. Requiring the discovery and production of documents; and
 - iv. Any other matter which may be necessary.
- i. The management of the Company shall act upon the recommendations of the IC immediately but not later than sixty (60) days of the receipt of the recommendations of the IC.

7. Conciliation

- a) Upon a request made by the Complainant, before initiating an inquiry into any alleged complaint, the IC may take steps in accordance of the Act to resolve the matter between the Complainant and Respondent, through conciliation.
- b) In case the Respondent agrees to actions such as apologies or voluntary resignation, without going through the formal disciplinary procedures, then on the basis of such actions, the Complainant and the Respondent may arrive at a resolution of the complaint informally.
- c) Where the parties have arrived at a conciliation, no further inquiry shall be conducted by IC. IC shall record the details of the conciliation and forward the same to Director – Human Resources (HR) for necessary action within ten (10) working days of the conciliation.
- d) It is to be noted that no complaint of Sexual Harassment shall and will be resolved by way of monetary settlement in case of conciliation.
- e) Subject to point (i) above, if the complaint has not been resolved through conciliation, IC may proceed to initiate a formal inquiry into the complaint.

8. Disciplinary Actions:

Based on the conclusions of the investigation, the IC will suggest (as a part of the written report in case of formal resolution) appropriate disciplinary action to the management of the Company; which can include written apology, counseling, carrying out community service, warning, reprimand or censure, suspension, transfer from project/location (of Complainant or the Respondent), withholding of promotion, deducting the salary or any such sum as it may deem necessary, withholding of pay rise or increment, direct the Respondent to pay to the Complainant such sum considering the trauma suffered, loss in career, medical expenses incurred, income or financial status of the Complainant or any action up to and including termination of employment. The Company will implement the actions with the support of the Human Resources Head of the Company.

9. Other Relief to Complainant During Pendency of Inquiry:

The IC at the written request of the Complainant may recommend to the Company.

- a) To either transfer the Complainant or the Respondent to any other location;
- b) Grant leave to the Complainant up to a period of three (3) months or grant such other relief to the Complainant as the IC deems appropriate; or
- c) Recommend to the manager of the upward hierarchy of the Company to restrain the Respondent from reporting on the work performance of the Complainant or writing her/his confidential report or assign the same to another officer.

10. Appeal

Any female aggrieved from the recommendations of the IC may prefer an appeal to the Labour Commissioner or regular courts of justice within ninety (90) days of the recommendations given by the ICC and any male aggrieved from the recommendations of the IC may prefer an appeal to the regular courts of justice within ninety (90) days of the recommendations given by the IC.

11. Confidentiality

- a) Cases that involve allegations of Sexual Harassment are especially sensitive, and special attention will be given to the issue of privacy for all individuals.
- b) The contents of the Complaint, the identity, and addresses of the Complainant, Respondent, and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the Company shall not be published, communicated or made known to the public, press, and media in any manner information will be released only on a need-to-know basis. c. Investigation at times may compromise total confidentiality.
- c) The Company may disclose anonymised and aggregated POSH-related statistics, including complaints received, resolved, pending and awareness/training coverage, in its sustainability or statutory reporting, without revealing any personal or confidential information.

12. Retaliation

This POSH Policy strictly prohibits any kind of intimidation or harassment of individuals who have filed complaints, instituted proceedings, assisted in investigations, or formally or informally objected to discriminatory practices, irrespective of the outcome. The Company will take strict action against those Employees who would indulge in such retaliatory actions. The Company will ensure that the Complainant or witnesses are not victimized or discriminated against while dealing with any complaint of Sexual Harassment.

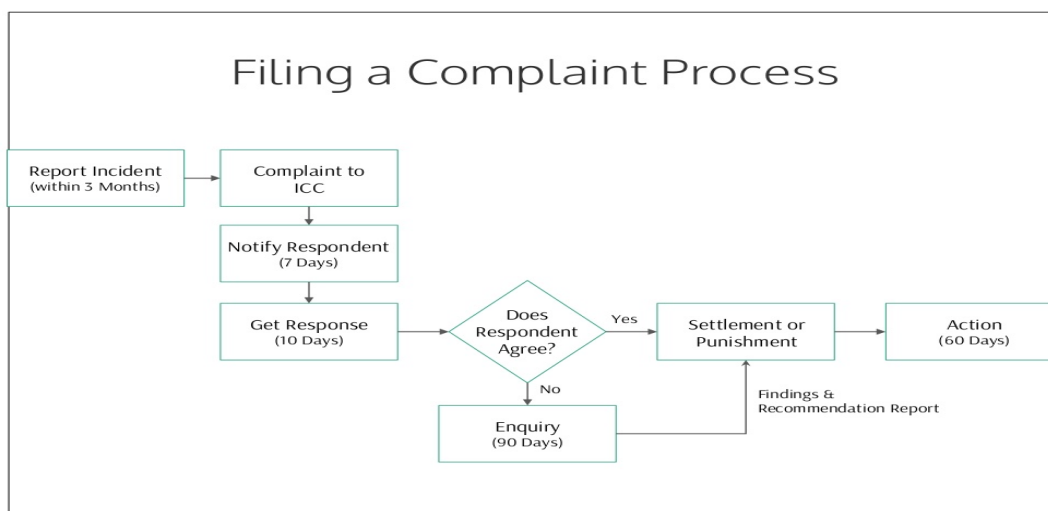
13. Communication, Awareness and Accessibility

- a. The Company shall communicate this Policy to all employees, workers, trainees, apprentices, probationers, consultants, contractual staff, and other covered persons, as applicable, through induction, periodic training, employee handbooks/manuals, notice boards, internal communication channels, and/or digital platform.
- b. The Company shall display or otherwise make available the details of the Internal Committee, complaint-reporting channels, and relevant rights and responsibilities under this Policy at conspicuous places at all workplaces and through appropriate internal communication channels.
- c. The Company shall conduct periodic awareness and sensitisation programmes on prevention of workplace harassment, reporting channels, inquiry process, confidentiality obligations, and protection against retaliation, including orientation and training for Internal Committee members.
- d. The Company shall retain records of such communication and awareness activities, including policy circulation emails, training records, noticeboard display evidence, participation logs, and employee acknowledgements, wherever applicable.
- e. The Company may disclose anonymised and aggregated POSH-related statistics, including complaints received, resolved, pending and awareness/training coverage, in its sustainability or statutory reporting, without revealing any personal or confidential information.

14. Frivolous or False Charges

- a. This POSH Policy shall not be misused to bring frivolous or malicious charges against fellow employees.
- b. If the Complaints Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Complainant has made the Complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend the Company to take any action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the Complainant from service or undergoing a counseling session or carrying out community service.

Flow Chart of the Process



Review of Policy

The Policy shall be reviewed on or before 31st, March 2029.

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Annex A - Sexual Harassment Complaint Form

Confidential

1. Employee Details

Name:	
Employee ID:	
Department:	
Designation:	
Contact Number:	
Email ID:	

2. Details of the Respondent (Accused)

Name:	
Department:	
Designation:	

3. Incident Details

Date(s) of Incident:	
Time:	
Location:	

4. Description of the Complaint

Please provide detailed description of the incident(s):

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5. Witness Details (if any)

Name:	
Employee ID:	
Department:	
Designation:	
Contact Number:	

6. Supporting Documents/Evidence (if any)

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7. Relief/Action Requested

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Declaration:

I hereby declare that the information provided above is true to the best of my knowledge.

Signature of Complainant:

Date:

Format – Internal Committee Report

1. Basic Details

Name of Organization:	
Location:	
Date of Report:	
Case Reference No.:	

2. Details of Complaint

Name of Complainant:	
Employee ID / Department:	
Date of Complaint Received:	
Mode of Complaint:	
Brief Description of Allegations:	

3. Details of Respondent

Name of Respondent:	
Employee ID / Department:	
Designation:	

4. Process Followed

Complaint received on:	
Notice sent to Respondent on:	
Response received on:	
Hearings conducted on:	
Witnesses examined on:	

5. Summary of Statements

a) Complainant Statement:

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b) Respondent Statement:

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c) Witness Statements:

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6. Documents/Evidence Reviewed

- Emails / Messages
- CCTV (if any)
- Supporting documents

7. Analysis & Findings

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8. Conclusion

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9. Recommendations

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10. Closure

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Signatures of Committee Members

Name:

Designation:

Dept:

Annexures (if any)