

## **JUVENOR HEALTHCARE LIMITED**

### **POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH)**

#### **INTRODUCTION**

As an organization, company is committed to ensuring that the work environment at all its locations is conducive to fair, safe and harmonious relations among employees. Discrimination and harassment of any type are strictly prohibited.

#### **SCOPE:**

This policy applies to all individuals who are employed for the time being in any capacity at company.

#### **DEFINITION**

##### **Aggrieved Person**

Person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent

##### **Company**

Juvenor Healthcare Limited.

##### **Employee**

Person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

##### **Internal Complaints Committee**

A committee constituted by Company as per this policy.

##### **Respondent**

A person against whom the aggrieved person has made a complaint.

##### **Sexual Harassment**

Includes one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- i. Physical contact and advances; or
- ii. demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets, or sayings; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature

## **THE POLICY**

Company's policy is to totally prohibit any form of sexual harassment in the way employees behave with each other. This would also include complaints relating to instances outside of the work place. This applies equally to relations between superior and subordinates as well as between peers. Any incident of sexual harassment will be viewed extremely seriously. A complaint or report of sexual harassment will be investigated immediately and appropriate action will be taken against the offending employee(s). Such action will depend on the nature and seriousness of the offence and will include strict disciplinary action including termination of service.

## **INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT:**

Company will establish an Internal Complaints Committee (ICC) for Sexual Harassment headed by a woman employee, not below the Level of a Manager, and comprising at least two women employees (including the Chairperson/Head of the ICC), and two other members.

## **PROCESS**

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;

(iii) One outside member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.

- The ICC shall under the authorization of the board of directors or committee responsible for formulation and administration of policies for the organization or any other Senior officer or Director/ Managing Director nominated by the board or committee, have the power to sub-delegate their authority to a sub-committee of ICC

for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.

- The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

## **CONCLUSION**

1 Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

2 The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

3 The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

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