

TRIOCHEM PRODUCTS LIMITED

MANUFACTURERS OF ETHICAL PHARMACEUTICAL PRODUCTS



Regd. Office : 4th Floor, Sambava Chambers, Sir P. M. Road, Fort, Mumbai - 400 001.
Tel. : 00 91 (22) 4082 8100 | Fax : 00 91 (22) 4082 8181 | E-mail : info@amphray.com
Corporate Identity Number : L24249MH1972PLC015544

POLICY ON PREVENTION OF SEXUAL HARASMENT AT WORKPLACE

1. COMMITMENT

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. SCOPE

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by client or by suppliers or any other business associates.

The workplace includes:

- 2.1. All offices or other premises where the Company's business is conducted.
- 2.2. All company-related activities performed at any other site away from other Company's premises.
- 2.3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, request for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual harassment at the workplace includes:

- 3.1. unwelcome sexual advances (verbal, written or physical),



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- 3.2. demand or for sexual favours,
- 3.3. any other type of sexually-oriented conduct,
- 3.4. verbal abuse or 'joking' that is sex-oriented,
- 3.5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and / or submission or rejection of the conduct is used as a basis for making employment decisions.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. COMPLAINT MECHANISM

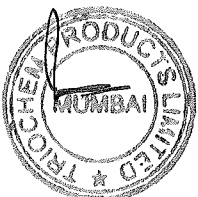
An appropriate complaint mechanism in the form of "Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

6. COMPLAINTS COMMITTEE

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

- 6.1. Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least two members will be of the same gender will be as that of the complainant:

- 6.1.1. Admin Head (Presiding Officer)



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6.1.2. Employees at the level of Assistant General Manager or above from Personnel & Administration Department (Member)

6.1.3. Department Personnel Head of the Department from where the complaint has originated (Member)

6.1.4. Member from an NGO or Lawyer (Member)

6.2. The Complaints committee is responsible for:

6.2.1. Investigating every formal written complaint of sexual harassment

6.2.2. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.

6.2.3. Discouraging and preventing employment-related sexual harassment

7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

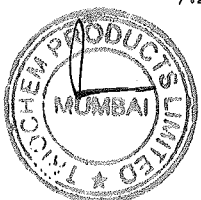
The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

7.1. Informal resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objectives immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints committee for redressal of their grievances. The Complaints committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

7.2. Complaints:



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- 7.2.1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
- 7.2.2. The Presiding Officer of the Complaints committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual harassment, preferably within 30 days from receipt of the complaint.
- In the event, the allegations does not fall under the purview of Sexual harassment or the allegation does not constitute an offence of Sexual harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
- 7.2.3. If the Presiding Officer of the Complaints committee determines that the allegations constitute an act of sexual harassment, he / she will proceed to investigate the allegation with the assistance of the Complaints committee.
- 7.2.4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate with the authority.
- 7.2.5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & CEO as



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soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & CEO will ensure corrective action on the recommendations of the Complaints committee and keep the complainant informed of the same.

Corrective action may include any of the following:

7.2.5.1. Formal apology

7.2.5.2. Counselling

7.2.5.3. Written warning to the perpetrator and a copy of it maintained in the employee's file.

7.2.5.4. Change of work assignment / transfer for either the perpetrator or the victim.

7.2.5.5. Suspension or termination of services of the employees found guilty of the offence

7.2.6. In case the Complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

(For more details, refer to the pictorial representation of the process flow given in Annexure A)

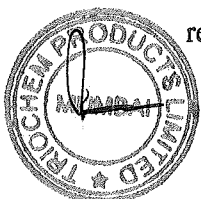
8. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

9. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.



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10. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company shall ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

11. CONCLUSION

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment / discriminate and where every employee is treated with dignity and respect.



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Annexure A

PROCESS FLOW

	Victim makes a formal Complaint to the Presiding Officer - Complaints Committee			
	Presiding Officer - Complaints Committee (HR) examines the allegation, preferably within 30 days from receipt of complaint	If the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute, the concern will be dismissed and communication will be sent to the Victim		
		Process ends		
	If the allegation falls under the purview of Sexual Harassment, the Presiding Officer appoints a Complaints Committee for further investigation			
	Complaints Committee conducts a detailed investigation with the accused and other individuals			
	Complaints Committee submits its Report to the ED and CEO preferably within 90 days of receipt of Complaint			
	ED and CEO taken decision on action to be taken			
Accused is exonerated	No	Concern Proved	Yes	Disciplinary Action is taken against the accused including preventive measures

Disciplinary Action shall be taken against the Complainant, if deemed fit.

