

POLICY OF PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE – FOR ALL GENDERS

Adopted on: September 15, 2022

1. PURPOSE

Cohizon Life Sciences Limited (“**Company**”) is committed to creating a healthy working environment that enables its employees to work without fear of prejudice, gender bias and harassment (including sexual harassment). The Company has zero tolerance for harassment (including sexual harassment) and believes that all employees of the Company have the right to be treated with dignity.

This prevention of sexual harassment policy (“**Policy**”) has also been formulated to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees in the Company are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.

The objective of this Policy is to provide the definition, framework and modus operandi for addressing all allegations of discrimination, harassment (including sexual harassment) and violence made by any Employee and enable the implementation of provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as modified from time to time (the “**Act**”). And the Transgender Persons (Protection of Rights) Act, 2019; and Rules, 2020 (The “**Transgender Act**”).

2. APPLICABILITY

This Policy applies to all employees (permanent, temporary and contractual), partners, vendors, consultants, trainees, clients and visitors at all work locations of the Company (including company offices, manufacturing sites, guest houses, any future establishments that come under the purview of work/work related visits for the company). This policy is also applicable to the transportation provided by the employer for undertaking journeys across locations and geographies for the Company’s work. This Policy shall be effective from the date aforementioned.

3. DEFINITIONS

- 3.1. “**Board**” means the board of directors of the Company;
- 3.2. “**Employee**” means a person employed at the Company for any work on a regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a director, consultant, co-worker, contract worker, a trainee, apprentice or called by any such name.
- 3.3. “**Employer**” means any person responsible for the management, supervision, and control of the Workplace and shall include a person discharging contractual obligations with respect to his or her employees. The term “management” includes the person or board or committee responsible for formulation and administration of policies for such Workplace.
- 3.4. “**Aggrieved Employee**” refers to any male or female or transgender employee, who is a victim of sexual harassment, during the course of employment, wherein the harasser maybe from any gender. For the purpose of this document an Aggrieved Employee will be mentioned as “**Complainant**”.

Cohizon Life Sciences Limited (Erstwhile known as Sajjan India Limited)

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- 3.5.** “**Harassment**” is any improper conduct by an individual, that is directed at and offensive to another person or persons in the Workplace, and that the individual knew or ought reasonably to have known would cause offence or harm. Harassment shall also include Sexual Harassment as defined below.
- 3.6.** “**Respondent**” means a person against whom a Complaint has been made by a Complainant under this Policy;
- 3.7.** “**Sexual Harassment**” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely –
- (a) physical contact and advances; or
 - (b) stalking (whether online or physical); or
 - (c) a demand or request for sexual favours; or
 - (d) making sexually coloured remarks or jokes, letters, phone calls or e-mails, gestures, showing of pornography or other visual displays of degrading sexual images, lurid stares; or
 - (e) sounds of a derogatory nature; or
 - (f) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to Sexual Harassment:

- (a) implied or explicit promise of preferential treatment in an Employee’s employment; or
 - (b) implied or explicit threat of detrimental treatment in an Employee’s employment; or
 - (c) implied or explicit threat about an Employee’s present or future employment status; or
 - (d) interference with an Employee’s work or creating an intimidating or offensive or hostile work environment for such Employee; or
 - (e) sexual harassment by one in position of power or influence constituting quid pro quo when submission by an individual is made either in explicit or implicit terms or condition of employment or submission to or rejection of such conduct is used as the basis for employment decisions affecting that Employee (such as promotion and pay rise).
 - (f) sexual violence means unacceptable behaviour and practices or threats thereof, which cause or are likely to cause physical harm; or
 - (g) humiliating treatment likely to affect an Employee’s health or safety.
- 3.8.** “**Workplace**” for the purpose of this Policy includes: (a) any offices of the Company, (b) remote working environments, (c) any social function or event, meeting, client event or other function/workshop/event (whether conducted virtually or in-person) or any off-site, retreat, conferences, (d) any mode of transport for undertaking a journey to and from the aforementioned locations (when such transportation has been provided by the Employer) and (e) any other place visited by the Employee during the course of their employment at the Company.

4. OBLIGATIONS OF THE COMPANY

- 4.1.** The Company shall be responsible for the following:
- (a) To spread awareness of the Policy amongst its Employees by providing easy access to the Policy through publication, notification and circulation of the same;
 - (b) Conduct training sessions from time to time to sensitize Employees about Harassment issues;
 - (c) Provide fair and impartial procedures for resolution, settlement or prosecution of acts of harassment by taking all necessary steps.

5. INTERNAL COMPLAINTS COMMITTEE

5.1. Constitution

In furtherance of this Policy, an internal complaints committee (“**Committee**”) will be constituted by the Company to address all cases/complaints of alleged Harassment submitted by an aggrieved Employee(s) (“**Complainant**”) or take action *suo moto*, in the absence of a Complaint being submitted by the Complainant to prevent Harassment within the outlined framework. The Company may set up sub-committees or engage external agencies to investigate such Complaints of Harassment as the Company may deem fit. The Committee shall also have power to direct the transfer of any matter/case from one sub-committee to another or to the Committee itself. The Committee will consist of the following members:

- (a) A presiding officer, who shall be a senior female employee nominated from amongst the Employees at the Workplace, or in the absence of such an Employee within the Workplace, from another branch or department of the Workplace, or from any other organization or workplace of the same Employer;
- (b) In addition to the presiding officer, there shall be at least two (2) members from amongst the Employees preferably committed to the cause of women or who have had previous experience in social work or have legal knowledge; and
- (c) One (1) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total members of the Committee so nominated shall be women.

5.2. Term

The presiding officer and every member of the Committee shall hold the position for a maximum period of three (3) years from the date of their appointment.

5.3. Removal from the Committee

A person shall be disqualified from being appointed, elected, nominated, designated for continuing, as a member of the Committee:

- (a) if such person contravenes the provisions of Section 16 of the Act or any provisions of this Policy;
- (b) if such person has been charged for an offence or an inquiry into an offence under any law for the time being in force is pending against such person;
- (c) if such person has been found guilty in any disciplinary proceedings (including proceedings involving complaint of sexual harassment) or a disciplinary proceeding is pending against such person.

6. CONFIDENTIALITY

- 6.1. Notwithstanding anything contained in the Right to Information Act, 2005, the contents of a Complaint made under clause 7 (*Complaint Procedure*) below, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Committee, as the case may be, and the action taken by the Employer under this Policy shall not be published, communicated or made known to the public, press and media in any manner:

Provided that, the Company may disclose any information regarding the relief provided to or secured by any Complainant under this Policy without disclosing the name, address, identity or any other particulars which can lead to the identification of the Complainant and / or the witnesses.

- 6.2. Any violation of this clause 6 (*Confidentiality*) will lead to the Employer initiating an inquiry and taking due action based on the inquiry report.

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7. COMPLAINT PROCEDURE

7.1. Lodging a complaint: A Complainant may make in writing a complaint of Harassment at the Workplace to the Committee, within a period of three (3) months from the date of incident and in case of a series of incidents, within a period of three (3) months from the date of last incident (“**Complaint**”), in the manner as outlined below:

- (a) A Complainant will be provided full confidentiality;
- (b) In case a Complaint is made against a person who is a member of the Committee, such person should excuse from the conduct of the Committee for such Complaint;
- (c) Upon receipt of Complaints including anonymous Complaints, the Committee shall forthwith convene a meeting of which advance written intimation will be given to the Complainant, to the extent such Complainant can be identified;
- (d) The Complainant will be entitled to remain present personally during the meeting.

The Committee, in cases, where it is satisfied by the reasons given for the delay, may allow a complaint to be made after the expiry of three (3) months.

Provided that when such a Complaint cannot be made in writing, the presiding officer or any member of the Committee shall render reasonable assistance for making the Complaint in writing.

7.2. Notice: The Complaint shall be submitted by the Complainant to the Committee in writing at [icc@Cohizon.com]. The Complaint can also be physically submitted to any Committee member.

7.3. Complaint in case of incapacity: Where the Complainant is unable to make a Complaint in writing due to physical or mental incapacity, then any other person may make a Complaint on behalf of the Complainant.

7.4. Resolution procedure through conciliation: Once the Complaint is received, before initiating an inquiry, the Committee may take steps to conciliate the Complaint between the Complainant and the Respondent. The process of resolution through conciliation shall only be conducted if requested by the Complainant in writing. No monetary settlement can be made as a basis of conciliation. In case a settlement is arrived at, the Committee shall record and report the full particulars of the settlement to the Employer. The Committee shall provide copies of the settlement to the Complainant and Respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the Committee. A resolution through conciliation has to be completed within 14 (fourteen) days from the receipt of the Complaint.

7.5. Initial inquiry: If: (a) the Complainant does not request for a resolution through conciliation; (b) the conciliation process has not resulted in any settlement; or (c) the Complainant informs the Committee that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent, then the Committee shall convene a meeting and inquire into the Complaint made by the Complainant in the manner set out under the ‘Proceedings’ section below.

8. ACTION DURING PENDENCY OF INQUIRY

8.1. During the pendency of the inquiry, the Complainant may make a request in writing for relief and the Committee may recommend to the Employer to:

- (a) Transfer the Respondent or the Complainant to any other workplace; or
- (b) Grant leave to the Complainant for a period not exceeding 3 (three) months;
- (c) Grant any other relief as may be appropriate.

If the Employer on the recommendation of the Committee grants any such relief then the Employer shall inform the same to the Committee within a reasonable period of time.

9. PROCEEDINGS OF THE COMMITTEE

9.1. The following is the redressal process, which will be adopted by the Committee to address any Complaint lodged by a Complainant:

- (a) Complainant should submit the Complaint along with supporting documents and the names of the witnesses, if any;
- (b) The Committee will hold a meeting with the Complainant within seven (7) days of receipt of the Complaint;
- (c) At the first meeting, the Committee members shall hear and record the allegations made by the Complainant. The Complainant may also submit any material with a documentary proof, oral or written material, etc., to substantiate the Complaint;
- (d) Upon completion of the first meeting the Committee will send one (1) copy of the Complaint to the Respondent within seven (7) days of such meeting;
- (e) Respondent shall reply with all supporting documents within seven (7) days of receiving the copy of the Complaint;
- (f) The Respondent shall be called for a deposition before the Committee and an opportunity will be given to the Respondent to provide an explanation;
- (g) The Complainant shall be provided with a copy of the written explanation submitted by the Respondent;
- (h) The Committee will give reasonable opportunity to the Complainant and the Respondent, for putting forward and defending their respective case by presenting witnesses and evidence, which may establish their claims;
- (i) The Committee shall complete the inquiry / investigation within a period not exceeding ninety (90) days from the date of initiating the inquiry. It shall prepare a report of its findings on the charges against the Respondent and its decision and submit such report to the Employer within a period of ten (10) days from the date of completion of the report.

10. IMPLEMENTATION OF RECOMMENDATIONS OF THE COMMITTEE

10.1. The Employer will implement the recommendations of the Committee with respect to the proposed corrective action against the Respondent within sixty (60) days of the submission of the report by the Committee.

11. MEETINGS OF THE COMMITTEE

11.1. The Committee will meet as and when required. The quorum requirement for a meeting of the Committee is three (3) members. It is mandatory that at-least half of the members of the Committee are women.

11.2. The Committee shall meet at a regular frequency and share the minutes of its proceedings before the Board for its review.

12. PROTECTION AGAINST VICTIMIZATION

12.1. The following will be obligations of the Company, during the processing / investigation of the Complaint:

- (a) In the event the Respondent is the Complainant's reporting manager / senior, then the Employer will review the possibility of relocating either the Complainant or the Respondent within the Company and ensure that the Complainant is not being evaluated by the Respondent;
- (b) Ensure that any sort of retaliation against the Complainant or witnesses is strictly prohibited;
- (c) Any act of reprisal, including internal interference, coercion and restraint, by the Respondent, whether directly or indirectly, will result in appropriate action against the Respondent by the Committee in consultation with the Employer;

- (d) In case the Respondent is a third party or customer interacting with the Company, such Respondent shall not be allowed to enter the Company premises except for the purpose of attending any meeting / interaction as and when required by the Committee;
- (e) If required, Company will give support to the victim through health services, counselling or legal support.

12.2. Post conclusion of the investigations of the Complaint, the Company will observe the following:

- (a) If the Respondent is found to be guilty, appropriate action will be taken against the Respondent by the Employer on the basis of the recommendations submitted by the Committee..
- (b) In case the Respondent is a third party or customer interacting with the Company, and found to be guilty, the Respondent may not be allowed to enter the Company premises;
- (c) In the event, the Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false and made with *mala fide* intention by the Complainant, then the Committee may make appropriate recommendations to the Employer to take such actions against the Complainant, as the Employer may deem necessary. *Mala fide* intent must be clearly established through an inquiry and mere inability to substantiate the Complaint will not make the Complainant liable.

13. MODIFICATIONS AND REVIEW OF THE POLICY AND DISCLOSURE

The Committee reserves the right to modify and/ or review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to align / alter the provisions of the Policy to the extent deemed necessary by Committee from time to time.

14. CONTACT

All queries and clarifications on the policy and procedures may be referred to the Human Resources department of the company.