Policy on Prevention of Sexual Harassment of Women at Workplace

Version: November /2026
Owner: HR Department, Zuventus Healthcare Limited

We, at Zuventus, believe that everyone has the rights to be respected and be equally treated. We are committed to providing a workplace that is free from prejudice, gender bias and sexual harassment.

Sexual harassment at the workplace of/by employees and non-employees such as clients, customers and business contacts is against the law and will not be tolerated.

Sexual harassment at the workplace results in violation of the fundamental rights of a woman:

- to equality under Articles 14 and 15 of the Constitution of India;
- to life and to live with dignity under article 21 of the Constitution of India;
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

Sexual Harassment is a punishable act under Section 354A of the Indian Penal Code / Section 75 of the Bharatiya Nyaya Sanhita (BNS), 2023.

Sexual Harassment at the work place will be deemed to be a violation/breach of terms of employment.

Sexual harassment shall lead to disciplinary measures including termination of employment, exclusion from Company premises, suspension/cancellation of contract and reporting the harassment incident to the relevant government authorities.

In order to create a safe and conducive work environment, this Policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act and the provisions of the Act shall prevail.

If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail.

This version of the policy is effective from the date of its release and supersedes all prior policies and communication on this matter.

A. The objectives of Policy on Prevention of Sexual Harassment at Workplace

This policy provides protection against sexual harassment of women at workplace and its prevention and redressal of complaints of sexual harassment and matters related to it. The objectives of this policy for Prevention of Sexual harassment include but are not limited to:

- ensuring that all employees and other persons who provide service to company are able to work, conduct activities or provide/have access to services in a safe and congenial work environment and are provided with appropriate work conditions in respect of work, leisure, health and hygiene.
- ensuring that there is no hostile environment towards any person at the workplace.
- ensuring that no woman employee should have reasonable grounds to believe that she is disadvantaged in connection with her employment due to sexual harassment or gender inequality.
- providing appropriate training to employees in order to raise their awareness on sexual harassment.
- setting up effective complaint handling mechanism for lodging complaints that will be sensitive to the feelings and needs of the complainant.
- handling complaints in objective and impartial manner.
- ensuring prompt and serious action in case of incidents of sexual harassment.

B. Applicability and Scope

1. Term "Workplace" includes all offices or other premises where the Company's business is conducted.

2. This policy shall be applicable to and shall be deemed to be incorporated in the service conditions of all employees of Zuventus Healthcare Limited.

3. The policy extends to any place visited by the employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.

4. Provisions of this policy shall also apply to any unwelcome behaviour of a sexual nature mentioned in the policy by/to any supplier, customer, business associates, contractors and other service providers of the Company including their representatives, employees, agents, supervisors, managers etc. when such incident has taken place on the Company premises.

5. Where sexual harassment occurs to the Company employee as a result of an act or omission by any third party or outsider, the Company will take all steps necessary and reasonable to assist her in terms of support and preventive action.

C. Definitions

1. **Aggrieved woman**: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

2. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.

3. **Employee:** A person employed at the workplace, for any work 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 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 a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

4. **Sexual Harassment ;** Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

a) Physical contact and advances;
b) A demand or request for sexual favours;
c) Sexually coloured remarks;
d) Showing pornography;
e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Unwelcome actions such as the following are inappropriate and, depending on the circumstances, may meet the definition of sexual harassment or contribute to a hostile work environment:

- Sexual pranks, jokes, lurid stares or innuendo in person or via e-mail, phone-calls, messages or other media;
- Verbal abuse of a sexual nature, commenting on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable.;
- Touching or grabbing of a sexual nature;
- Repeatedly standing too close to or brushing up against a person, deliberate body contact;
- Repeatedly asking a person to socialize during off-duty hours when the person has indicated her unwillingness
- Making proposals, giving gifts or leaving objects that are sexually suggestive;
- Eve teasing, repeatedly making sexually suggestive gestures;
- Making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace;
- Off-duty, unwelcome conducts of a sexual nature that affects the work environment.
- Unwarranted inquiries into the private life of employees or persistently asking them out.

Even if the act of sexual harassment is not intentional or is of a playful nature or there is no evidence to prove the intention, it may still amount to sexual harassment if they are unwelcome to the recipient.

A single incident may also amount to sexual harassment.

It is also possible for a person weaker in power to harass a more powerful person, e.g., a subordinate harasses the superior.

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

- implied or explicit promise of preferential treatment in her employment; or
- implied or explicit threat of detrimental treatment in her employment; or
- implied or explicit threat about her present or future employment status; or
- interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- humiliating treatment likely to affect her health or safety.

5. **Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

D. Rights of victim and various actions to be taken

Aggrieved Women has a statutory right to lodge a complaint on sexual harassment.

You can take following action in case of Sexual Harassment:

1. Direct Communication: Say "NO" clearly and firmly. Convey to the person who is the cause of distress, that the said behaviour is unwelcomed and not appreciated. Provide a written "No" if a verbal "No" proves inadequate. By ignoring the situation, you may send out the message that the harasser has the right to continue such action.
2. Report the matter to HR Department: HR Department will offer you help to resolve the matter.
3. Document as many evidence as possible: Keep a record that includes the date, time, location and description of each incident of harassment. Be as accurate as possible with regard to details about what was said or done. Keep an electronic file of text messages and emails that contain harassment information. Maintenance of evidence is very important to future complaint or litigation though it does not mean that you cannot lodge complaint if you do not have record of such incident or matter.
4. **File a Complaint**: If despite asking the harasser, the harassment does not stop, you must file complaint as soon as possible with Internal Committee (hereinafter called "IC"). Please note that you can directly file complaint without making any communication with harasser or HR Department if you believe that filing complaint directly with IC is appropriate. You have a statutory right under "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" to file complaint with IC.
5. Please note that above-mentioned complaint handling procedure does not affect your right and remedy of lodging complaints with police authorities [especially when harassment amounts to crime under the Indian Penal Code ("IPC") or any other criminal law] or other remedies under Human Rights Act 1993 or other applicable laws.

E. Internal Committee (IC)

1. To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Committees have been formulated for all locations requiring such constitution as per the provisions of the Act. The detail of the committee is notified to all covered persons at the location.

2. While the IC at Corporate Head Office will handle all complaints received in Mumbai operations, representatives from various locations (workplace) are co-opted into the IC to cover the various locations of Zuventus Healthcare Limited. The details about the current members of the IC at the Corporate Head Office as well as other locations are given in **Annexure A.**

3. The committee at each location comprises of:

    - Presiding Officer: A woman employed at a senior level in the organization or workplace provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.
    - At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge.
    - One external member, familiar with the issues relating to sexual harassment from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
    - At least one half of the total members is women.

4. The IC is responsible for:

    - Receiving complaints of sexual harassment at the workplace.

- Initiating and conducting inquiry as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines.
- Submitting annual reports in the prescribed format.

5. In case of happening of any vacancy on IC, the Company may depute suitable replacement.

F. Procedure for Redressal through IC

1. Filing of Complaint:

a. Any aggrieved woman may make, in writing under signature, a complaint of sexual harassment at workplace to IC within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last such incident. We recommend filing complaint at the earliest possible moment as filing complaint early is highly essential for proper investigation of such complaints.

b. IC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such, which prevented the woman from filing a complaint within the said period.

c. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of IC shall render all reasonable assistance to the woman for making the complaint in writing.

d. Where the aggrieved women is unable to make a complaint on account of her physical incapacity, a complaint may be filed by -

i. her relative or friend; or
ii. her co-worker; or
iii. an officer of the National Commission for Women or State Women's Commission; or
iv. any person who has knowledge of the incident, with the consent of the aggrieved women

e. Where the aggrieved women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by -

i. her relative or friend; or
ii. a special educator; or
iii. a qualified psychiatrist or psychologist; or
iv. the guardian or authority under whose care she is receiving treatment or care; or
v. any person who has knowledge of the incident jointly with her relative or friend or a special educator or a qualified psychiatrist or psychologist or guardian or authority under whose care she is receiving treatment or care.

f. Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the consent of the aggrieved women.

g. Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the consent of the legal heir of the aggrieved women.

2. Conciliation:

a. IC shall, before initiating an inquiry and at the request of the aggrieved woman, take steps to settle the matter through conciliation between her and the person against whom the complaint has been filed ("the respondent") provided that no monetary settlement shall be made as a basis of conciliation.

b. Where a settlement has been arrived at under sub-clause F.2.a, IC shall record the settlement so arrived and forward the same to the Company.

c. IC shall provide the copies of the settlement as recorded under sub-clause F.2.a to the aggrieved woman and the respondent.

d. Where a settlement is arrived at under sub-clause F.2.a, no further inquiry shall be conducted by IC.

3. Inquiry:

a. If the aggrieved woman does not choose Conciliation or no settlement is arrived at the Conciliation or if aggrieved woman informs that any term or condition of the settlement arrived at under sub-clause F.2.a has not been complied with by the respondent, IC shall adopt following procedure for inquiry.

b. The complainant shall submit to IC, Six copies of the complaint along with supporting documents and names and addresses of the witness.

c. After receipt of the complaint, within a period of seven working days, IC shall send to the respondent, a copy of the complaint received and inform the respondent that no act of retaliation would be tolerated.

d. During the pendency of the inquiry, IC may, at the written request of the aggrieved women, recommend to the Company to:

i. transfer the aggrieved woman or the respondent to any other workplace; or
ii. grant leave to the aggrieved woman up to a period of three months; or
iii. restrain the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report and assign the same to another officer

The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

e. The Respondent shall file reply to the complaint along with his list of documents and names and addresses of witness within a period of ten working days from the date of receipt of the notice / intimation under sub clause F.3.c.

f. In conducting the inquiry including examination of evidences and witness, at least 3 members of IC, including the Presiding Officer, should be present.

g. Examination of evidence shall be done by comparing copy of evidences with originals. Statement of witnesses shall be reduced in writing and shall be verified through signature of witnesses.

h. IC shall provide every reasonable opportunity to the complainant and respondent for putting forward and defending their respective case. Neither party shall bring any legal practitioner to represent them before IC. For the purpose of making an inquiry, IC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908, when trying a suit, in respect of the following matters, namely:-

i. summoning and enforcing the attendance of any person and examining him on oath;
ii. requiring the discovery and production of documents;

i. IC shall have right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the IC. Provided that such termination or ex-parte order shall not be passed without giving a notice in writing, fifteen days in advance, to the other party.

j. IC shall study the complaint, reply, adjoining documents, other evidences, statement of witnesses and complete the whole inquiry process within Ninety (90) days.

k. IC shall document the findings in a report.

l. On the completion of an inquiry, within a period of ten days from the date of completion of the inquiry, IC shall provide a report of its findings to the employer and such report be made available to the concerned parties to enable them to make representation against the findings before the IC.

m. If IC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter and thus the Complaint would be dropped. IC must record reasons thereof. IC may recommend disciplinary action in case of malicious complaints.

n. If, during investigation, IC concludes that sexual harassment has taken place, IC shall recommend in its report

i. suitable disciplinary action and

ii. amount which shall be deducted from the salary or wages of the respondent as it may consider appropriate to be paid as compensation to the aggrieved woman or to her legal heirs, as it may determine,

o. While determining amount to be paid by the respondent to the victim as compensation, IC shall have regard to:

- the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- the loss in the career opportunity due to the incident of sexual harassment;
- medical expenses incurred by the victim for physical or psychiatric treatment;
- the income and financial status of the respondent;
- feasibility of such payment in lump sum or in instalments

p. On the recommendation of the IC, the Company shall implement the recommendations and send the report of such implementation to IC.

4. Principles for handling complaints by IC

IC, while handing the complaints, must observe following principles:

- Impartiality: Inquiry and Investigation should be handled in a just, impartial and unprejudiced manner ensuring that the complainant and the respondent are fairly treated and both parties have chances to present their case.

- Disclosure of interest: Member of IC must disclose if he/she is related to the complainant or the respondent or has any interest, in any manner, in the investigation which may impact his/her impartiality or performance. The Company shall depute suitable replacement at IC in order to avoid clash of interest.

- Transparent and solution oriented: Though IC needs to document all material information, it must avoid acting like criminal court. Most sexual crimes are committed in private; hence, there may not be any eyewitnesses. "Resolution of grievance" should be central to its activities. While recommending disciplinary actions, it should be seen that they are fair, appropriate, level headed and justified after considering all of the circumstances as a whole.

- Handling cases discreetly: It is necessary to handle complaints discreetly so that related parties would not be unnecessarily distressed. IC member should show empathy to the feelings of complainant, for instance, avoiding asking the complainant to repeat her painful story. IC must ensure that complainant would not be unnecessarily further distressed or humiliated.

G. Confidentiality:

1. All information and records related to a sexual harassment complaint must be kept confidential. The contents of the complaint made, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner. Provided that information may be disseminated by the Company regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

2. If the member of IC or any other person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken contravenes this clause, he/she shall be liable for penalty of Rs. 5,000/-.

H. Disciplinary Action

1. Depending upon the severity & sensitivity of the incident and as may be recommended by IC, the Company shall take, within Sixty days of Receipt of the report of IC, appropriate disciplinary action which may include but shall not be limited to:

    - Asking the respondent to make written apologies
    - Asking respondent to undergo counselling or carrying out community service
    - Issuing letter of warning, reprimand of censure to the respondent
    - Withholding promotion, pay rise or increment
    - Imposing fine
    - Transfer
    - Suspension
    - Termination
    - Denying access to workplace
    - Suspension/ cancellation of contract, orders

2. The Company shall, in addition to the disciplinary action, which it may take, deduct amount as compensation from respondent to the victim as may be recommended to it by the IC.

3. In case the Company is unable to make such deduction from the salary of the respondent due to respondent being absent from duty or cessation of employment, it may direct to the respondent to pay such sum to the aggrieved woman. Provided further that in case the respondent fails to pay such amount, IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

4. The Company shall provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;

5. The Company shall cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.

I. Malicious Complaint

Please note that filing of any frivolous or malicious complaint is a serious breach of employment terms and may amount to offence under the applicable laws. If IC, during its investigation, arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend suitable action, in accordance with clause no. H, against the woman or the person who has made the complaint or has produced any forged or misleading document.

While making such recommendation, IC must take into consideration that inability to prove the contents of complaint does not *ipso facto* means that complaint was baseless or incorrect or malicious/frivolous. Before recommending any action, IC must establish, after an inquiry in

accordance with the procedure mentioned in this policy, the malicious intent on part of the complainant. While making any such recommendation, IC must record its reasons.

J. Appeal

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and Rules.

K. Collective Duty

It is collective duty of everybody to:

- Promote gender equality
- Protect women's rights and interest
- Report situations of sexual harassment and explore counter measures

Annexure A

Details about the current members of IC at Corporate Head Office Mumbai

Name of Member	Role	Contact Number	Email address
Ms. Vrushali Ghag	Presiding Officer	9887574250	vrushali.ghag@zuventus.com
Mr. Dinesh Ghuryani	Member	9826439143	dinesh.ghuryani@zuventus.com
Ms. Paresha Patil	Member	9867220148	paresha.patil@zuventus.com
Ms. Deepa Bakshi	Member	9821516592	deepa.bakshi@zuventus.com
Ms. Bharathy Tahiliani	External Member	9819754450	bharathy@kshamata.org

Details of other members co-opted for various locations (workplace)

Name of Location	**Name of Member**	**Role**	**Contact Number**	**Email address**
Jammu Plant	Ms. Rita Devi	Presiding Officer	7006143892	ritadevilabcont@gmail.com
	Ms. Chahat Vaid	Member	9149949481	chahatvaid010@gmail.com
	Ms. Shriya Bhat	Member	9682380922	shriyabhat000@gmail.com
	Mr. Anil Kumar Mishra	Member	9103325031	Anil.Mishra@zuventus.com
	Mr. Sanjay Mehra	External Member	9419199288	Sans2527@gmail.com
Sikkim Plant	Ms. Paresha Patil	Presiding Officer	9867220148	paresha.patil@zuventus.com
	Mr. Debabrata Burman	Member	9831090326	Debabrata.Burman@zuventus.com
	Mr. Dinesh Ghuryani	Member	9826439143	dinesh.ghuryani@zuventus.com
	Ms. Rajni Singh	Member	9816159212	Rajni.Singh @zuventus.com
	Ms. Dhan Maya Chhetri	External Member	9733161255	vhas2singtam@gmail.com
Bangalore Plant	Ms. Paresha Patil	Presiding Officer	9867220148	paresha.patil@zuventus.com
	Mr. Kuberappa Jigali	Member	9902248311	kuberappa.jigali@zuventus.com
	Ms. Shubha L M	Member	9964708803	Shubha.LM@zuventus.com
	Dr. Rathna Kumari	External Member	9902830665	rkskumven@gmail.com
Pune R & D	Ms. Sushama Kakade	Presiding officer	9860088324	sushamap.np@gmail.com
	Ms. Meena Ganbote	Member	9545331202	Meena.Ganbote @zuventus.com
	Mr. Dinesh Ghuryani	Member	9826439143	dinesh.ghuryani@zuventus.com
	Dr. Neha Sathe	External Member	9881136670	nehavikramsathe@gmail.com

Pune CWH Maan	Ms. Sushama Kakade	Presiding officer	9860088324	sushamap.np@gmail.com
	Mr. Yogesh Aserkar	Member	9370260107	Yogesh@ emcure.co.in
	Mr. Dinesh Ghuryani	Member	9826439143	dinesh.ghuryani@zuventus.com
	Dr. Neha Sathe	External Member	9881136670	nehavikramsathe@gmail.com