

Veeda Clinical Research Pvt. Ltd.

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| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 1 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

1.0 INTRODUCTION

- 1.1 Veeda Clinical Research strives for competitive excellence through its commitment to lawful and ethical conduct and adhering to its core values. The company is committed to provide a safe and conducive work environment to its employees and expects them to combine expertise with responsibility. Towards this, it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realises that his/ her behaviour will be attributed to the company and can affect its inwards and outward reputation.
- 1.2 Under corporate compliance, harassment of any kind including sexual harassment is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers his or her own behavior to be acceptable and of whether the harassed person has the opportunity to avoid the harassment.
- 1.3 This policy has been formed to prohibit, prevent or deter the commission of such acts and to provide the procedure for the redressal of complaints pertaining to sexual harassment in accordance with the provisions of Indian law of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

2.0 OBJECTIVE

- 2.1
- a) To fulfill the directive of the Supreme Court of India directing all employers to develop and implement a policy against sexual harassment of employees at the workplace
 - b) To uphold women’s Right to Protection against Sexual Harassment and the Right to Livelihood and towards that end for the prevention and redressal of sexual harassment of women;
 - c) To evolve a permanent mechanism for the prevention, prohibition and redressal of sexual harassment of employees at the workplace within the company.
 - d) To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of women;
 - e) To ensure implementation of the policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment;
 - f) To uphold the commitment of company to provide an environment free of discrimination and violence against women;
 - g) To generate public opinion against sexual harassment of women at the workplace.

| | | |
|--|-----------------------------|------------------------------|
| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 2 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date:27 Nov 2020 |
| | | Next Review Date:27 Nov 2022 |

3.0 SCOPE

3.1 This policy applies to all categories of employees of the Company, including permanent, temporaries, trainees and employees on contract at its workplace or at client sites.

3.2 The workplace includes:

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

4.0 RESPONSIBILITY

4.1 The Head–Human Resource shall be responsible for formulating and implementing this policy and review the same as per requirement.

4.2 All employees are responsible to understand and follow this policy while in the services of the company.

5.0 ABBREVIATIONS

5.1 VIN: Veeda Clinical Research Pvt. Ltd., Ahmedabad, India

Management: Directors and CXO's

HRD: Human Resource Department

Dept: Department

HOD: Head of the Dept

6.0 ASSOCIATED DOCUMENTS

6.1 Nil

7.0 POLICY STATEMENTS

7.1 Definition of Sexual Harassment

7.1.1 Sexual harassment would mean and include any of the following:

- a) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- b) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls; E-mail, gestures,

Veeda Clinical Research Pvt. Ltd.

| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
|--|-----------------------------|------------------------------|
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 3 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date:27 Nov 2020 |
| | | Next Review Date:27 Nov 2022 |

showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/ his performance; Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

- c) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- d) Any unwelcome gesture by an employee having sexual overtones.

7.2 Responsibilities Regarding Sexual Harassment

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

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

7.3 Complaint Mechanism

7.3.1 Veeda in accordance with the provision of the law has constituted an Internal Complaint Committee (ICC) for time-bound redressal of the complaint made by the victim. Any female employee/visitor in Veeda can send in their query/complaint to POSHCommittee@veedacr.com. Based on the query /complaint received the committee members will review and reply or take necessary action as per policy.

7.4 Complaint Redressal Committee

7.4.1 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as following:

| Sr. No. | Name | Position |
|----------------|---|-----------------|
| 1. | Ms. Swati Guttikar | Chairperson |
| 2. | Ms. Ameer Kanuga | Member |
| 3. | Mr. Jitendra Parmar | Member |
| 4. | Mr. Rudolph Pinto | Member |
| 5. | Dr. (Mrs) Mira Desai | Member |
| 6. | Ms. Jharna Pathak- Member from NGO "AWAG" | Member |

7.4.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

7.4.3 The Complaint Redressal Committee is responsible for:

Veeda Clinical Research Pvt. Ltd.

| | | |
|--|-----------------------------|-------------------------------|
| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 4 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

- a) Investigating every formal written complaint of sexual harassment
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- c) Discouraging and preventing employment-related sexual harassment

7.4.4 Informal Resolution Options

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

- a) When an incident of sexual harassment occurs, the victim of such conduct can communicate her/his disapproval and objections immediately to the harasser and request the harasser to behave decently.
- b) Keep a record of incidents (dates, times, locations, possible witnesses, what happened and your response to the same). It is not mandatory to have a record of events to file a complaint but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately;
- c) File a complaint as soon as possible. If, after asking the accused to stop their behaviour, the harassment continues, report the abuse to the Complaints Committee formed for this purpose.

7.5 Redressal Process

7.5.1 Any 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 Chairperson of the Complaints Committee constituted by the Management.

7.5.2 The complaint shall have to be in writing and can be in form of a letter, preferably within 7 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 her name, department, division and location she/he is working in, to enable the Chairperson to contact the victim to take the matter forward.

7.5.3 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

7.5.4 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.

7.5.5 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with

Veeda Clinical Research Pvt. Ltd.

| | | |
|--|-----------------------------|-------------------------------|
| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 5 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

- 7.5.6 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- 7.5.7 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 7.5.8 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- 7.6 Enquiry Process
- 7.6.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 7.6.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 7.6.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 7.6.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 7.6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copies of such documents. Both shall affix his /her signature on the respective documents to certify these to be original copies.
- 7.6.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 7.6.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

Veeda Clinical Research Pvt. Ltd.

| | | |
|--|-----------------------------|-------------------------------|
| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 6 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

7.6.8 During the pendency of an inquiry, on a written request made by the aggrieved woman, the Internal Committee may recommend to the employer to

- a) transfer the aggrieved woman or the respondent to any other workplace; or
- b) grant leave to the aggrieved woman up to a period of three months; or
- c) Grant such other relief to the aggrieved woman as may be prescribed. The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

7.6.9 The Committee shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Head-HR/ Chief Operating Officer/ Group Managing Director. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

7.6.10 The Management will direct appropriate action in accordance with the recommendation proposed by the Committee.

7.6.11 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7.6.12 Corrective action may include any of the following:

- a) Formal apology
- b) Counseling
- c) Written warning to the perpetrator and a copy of it maintained in the employee’s file.
- d) Change of work assignment / transfer for either the perpetrator or the victim.
- e) Suspension or dismissal of services of the employee found guilty of the offence

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

7.7 Confidentiality

7.7.1 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.

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

Veeda Clinical Research Pvt. Ltd.

| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
|--|-----------------------------|-------------------------------|
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 7 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

7.8 Access to Reports and Documents

7.8.1 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.

7.9 Protection to Complainant/Victim

7.9.1 Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation at the workplace. While dealing with complaints of sexual harassment, the Committee shall ensure that the complainant or the witnesses are not victimised or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

7.10 Documentation

7.10.1 The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Complaints Committee.

7.11 Complaints made with Malicious Intent

7.11.1 This Policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/ tarnishing their image in the company and to settle personal/ professional scores; strict action will be taken against the complainant.
Provided that a mere inability to provide adequate proof need not attract action against the complainant

7.11.2 The employees who are victims of sexual harassment may, in addition to the above seek legal remedies as may be provided under the various laws for the time being in force.

7.12 Awareness

Veeda Clinical Research Pvt. Ltd.

| | | |
|--|-----------------------------|-------------------------------|
| Policy Title: Prevention, Prohibition and Redressal of Sexual Harassment of Employees | | |
| Policy No.: VIN/HR/023 | Version No.: 05 | Page 8 of 8 |
| Department: Human Resource | Effective Date: 28 Nov 2020 | Last Review Date: 27 Nov 2020 |
| | | Next Review Date: 27 Nov 2022 |

7.12.1 All the employee shall have access to this policy at any given point of time and clarification related to this policy shall be addressed by the HR team. Orientation session will be arranged for employees regarding the features of this policy and to new employees during their initial induction. Company shall comply with all other details as set out under section 19 of the Act to ensure that all employees are provided with safe working environment at the work place.

8.0 MANAGEMENT RIGHTS

8.1 Management reserves the right to amend or repeal any sections or provisions of this policy at any time as it deems fit.

9.0 REFERENCE

9.1 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013

| | Written by | Reviewed by | Approved by |
|-------------|----------------------------|--------------------------------|-------------------|
| Name | Manmohansinh Chauhan | Rudolph Pinto | Ajay Tandon |
| Designation | Asst. General Manager- HRD | Sr. General Manager- HRD & AMD | Managing Director |
| Signature | | | |
| Date | | | |