



Applicability :	All employees
Policy Administration :	HR
Initiated by :	Vice President – HR & Admin
Authorized by :	Chairman
With effect from :	15 th February, 2022
Version :	1.0


11/02/2022

Objective:

- To uphold the commitment of BDR to provide an environment free of discrimination and indecent behavior against women at workplace.
- To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of women.
- To ensure the 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.
- To evolve a mechanism and forum for the prevention and redressal of sexual harassment

Scope:

- This Policy shall apply to all employees (means a 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 for a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, the management, retainers, consultants, probationers, apprentice and trainees of the Company), present and future (collectively referred to as "Employee" or "Employees" for the purposes of this Policy).
- This Policy shall apply to all allegations of sexual harassment, whether within or outside the premises of the Company and/ or during the course of an Employee's employment and shall come into force with immediate effect. The Policy shall also apply in respect of all complaints of sexual harassment made by a third party against an employee, or vice versa if the sexual harassment is alleged to have taken place within the Company's premises and/ or during the course of such Employee's employment.
- This policy is not intended to impair or limit the right of anyone to seek a remedy available under law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a complainant against an alleged perpetrator under any law in force.
- "Workplace" means the organization or establishment including commercial, professional, industrial, financial, production, supply, sales, distribution or service as well as any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey

Prevention of Sexual Harassment:

- No woman shall be subjected to sexual harassment at any workplace.
- The following circumstances, if it occurs or is present in relation to or connected with any act or behavior 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 to affect her health or safety.

Internal Complaints Committee:

- The Company constituted an Internal Complaints Committee, which would deal with all complaints and allegations of Sexual Harassment (the “Internal Complaints Committee”). The Internal Complaints Committee shall be presided by a woman employed at a senior level at workplace from amongst the employee.
- Not less than two members from amongst the employees.
- One member from non-governmental organization or associations preferably committed to the cause of women or who have had experience of social work or have legal knowledge.
- Provided that at least half of the total Members nominated shall be women.
- The names of the members of the Internal Complaints Committee along with their contact details shall be prominently displayed, from time to time, on the notice boards(s) of the Company at each of its offices/premises across the country. The Company shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Internal Complaints Committee, or to the contact details of the members of the Internal Complaints Committee.
- An Employee Member shall cease to hold office as a member of the Internal Complaints Committee if he/ she ceases to be an employee of the Company. Further, member shall be disqualified from acting as members if he/ she is found guilty of committing an act of Sexual Harassment or any other act of moral turpitude and this policy shall continue to apply to such Employee Members of the Internal Complaints Committee in their capacity as employees of the Company. In the event of any disqualification, resignation, or termination of appointment (by the Company) of any member, the Company shall, with respect to an outgoing Employee Member, forthwith notify a substitute Employee Member and shall, with respect to the Independent Member, make best efforts to find a substitute member as quickly as possible.
- The term of the Internal Complaints Committee shall be 3 (Three) years from the date of its appointment. Provided however the Company may temporarily extend the term of the Internal Complaints Committee in order to dispose of any pending complaint.
- Notwithstanding the aforesaid, the Company shall be entitled, at its discretion and at any time and without any notice to terminate the appointment (as member of the Internal Complaints Committee) of any member and appoint a substitute thereof.
- Chairman of the Company constitutes this Internal Complaints Committee on the recommendation of the Head of Human Resources.

Functions of Internal Complaints Committee

- The Internal Complaints Committee shall:
 - Conduct enquiries in accordance with the procedures into any of the allegation of Sexual Harassment received.
 - Keeping a record of all complaints received and the actions taken by the Committee and the Company thereon.
- The Internal Complaints Committee shall, at the end of each calendar year, prepare a consolidated report of all the complaints received and the actions taken by the Company thereon and shall

submit the same to concerned government department (with a copy to the management of the Company).

Meetings and Functions of Internal Complaints Committee

- The members of the Internal Complaints Committee shall ordinarily meet at least once in every 6 months at the place (in the Company's premises or offices) and time as notified by the Chairperson. In the event of the Chairperson being absent in any meeting, the members shall appoint another member to be the substitute Chairperson for that meeting.
- The Chairperson of the Internal Complaints Committee shall convene special meeting of a complaint of Sexual Harassment by the committee. The meeting shall be convened as expediently and at reasonable possible time.
- The quorum for any valid meeting of the Internal Complaints Committee shall be at least four members including the independent member and with not less than half the members present at such meeting being women. In the event of the number of members present and/or women members present at any meeting is less than aforesaid, the Internal Complaints Committee shall not discuss any matters or take any actions/ decisions save and except for electing the substitute Chairperson in case the Chairperson is absent and such meeting shall be adjourned to the following day or such other day as the Chairperson/ substitute Chairperson shall specify.
- In the event that the aforesaid number of members present is still less than as stated above at any meeting, adjourned from a previous day, the Chairperson shall notify the Company (the Human Resource Department) of the absence of such members and the Company shall take steps to forthwith appoint a substitute member in place of the absentee members and the meeting of the Internal Complaints Committee shall be held on the next day.
- The recommendation of the Internal Complaints Committee shall be decided by the majority vote and in cases of division of votes equally, the Chairperson shall have a casting vote

Initiation of Complaint:

- An aggrieved woman may make, in writing, a complaint of Sexual Harassment at workplace to the Internal Complaints Committee if so constituted, within a period of 3 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 incident.
- Provided that where such complaint cannot be made in writing, the Presiding Officer or the Member of the Internal Complaints Committee shall render all reasonable assistance to the woman for making the complaint in writing.
- Provided further that Internal Complaints Committee for the reasons to be recorded in writing, extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such which prevented the woman from filing the
- Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

Conciliation and Enquiry Procedure:

- The Internal Complaint Committee before initiating the enquiry and at the request of aggrieved women may take steps to settle the matter between her and the respondent through conciliation.
 - Provided that no monetary settlement shall be made as a basis of conciliation.
 - Where a settlement has been arrived, the Internal Complaints Committee shall record the settlement so arrived and forward the same to the employer to take actions as specified in the recommendation.
 - The Internal Complaints Committee shall provide the copies of the settlement to the aggrieved woman and the respondent.
 - Where the settlement has arrived, no further enquiry shall be conducted by the Internal Complaint Committee.
- The Enquiry Committee shall follow principles of natural justice in all its proceedings and shall as far as possible maintain confidentiality of the identity of the Complainant, the Respondent and the witnesses.
- On completion of an inquiry, the Internal Complaints Committee shall provide a report of its findings to the employer within a period of 10 days from the date of completion of the enquiry and such report be made available to the concerned parties.
- Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend the appropriate actions as per Sec 13(3) of the Sexual Harassment of the Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The Company shall act upon the recommendation within 60 days of its receipt by him.
- Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or aggrieved woman or any other person making the complaint has made the complaint knowing it to be a false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document; it may recommend to the employer to take action against the woman or the person who has made the complaint in accordance with the provisions of the service rules applicable to her or him or where no such service rules exist, in such manner as may be prescribed.
- Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section.
- Provided that the malicious intent on part of the complainant shall be established after an enquiry in accordance with the procedure prescribed, before any action is recommended.
- Where the Internal Complaints Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to take actions in accordance with the provisions of the service rules as applicable to the said witness or where no such service rules exist, in such manner as may be prescribed.
- All actions and recommendations of the Internal Complaints Committee shall be in accordance to the provision of the act applicable.

Third Party Harassment:

- In case of any complaints of Sexual Harassment committed by any third party (not being an Employee) the Internal Complaints Committee shall actively assist and provide all its resources to the Complainant in pursuing the complaint and ensuring his/ her safety in the Company premises during the course of his/her work for the Company on all working days and in case of any special work being conducted on holidays.

Confidentiality and Protection against Victimization:

- The Company shall ensure that an Employee who complains to the Internal Complaints Committee or participates in the investigation of the Enquiry Committee as a witness or otherwise shall not be subject to any unfavorable treatment whatsoever during the course of his/ her employment

Miscellaneous:

- The Company shall in consultation with the Internal Complaints Committee periodically review the provisions of this Policy and its implementation (taking into account the practical problems, if any, faced by the Internal Complaints Committee and/or the Company in the implementation of this Policy).
- The Company reserves the right to amend the provisions of this Policy, from time to time, as deemed necessary.
- It shall be the duty of the management and the heads of each location, factory, department or office of the Company to read and acquaint themselves with the issues of sexual harassment and to endeavor to prevent or avoid situations or circumstances, which would be likely to create a hostile or offensive environment.
- The Head of the Human Resource Department may be contacted for any queries or clarifications about this Policy, its implementation and the general rights or remedies of an Employee under this Policy or otherwise.

Annual Report:

- Internal Committee Members need to submit an annual report on sexual harassment to the Chairman.

Revision of the Policy:

- Management reserves the right to revise, amend or modify this policy at any time and in any manner without notice. Any change or revision will be available with Corporate HR team and communicated appropriately.

**'Internal Complaints Committee' as per Company policy for
Prevention of Sexual Harassment of Women (P.O.S.H) at
Workplace:**

The following 'Internal Complaints Committee' is constituted by the Company.

1. Ms Charmi Thakkar, Manager-QA-Presiding Officer
Email ID charmi.thakkar@bdrpharma.com Mobile no - 7229015552
2. Ms Brijal Kumari, Sr.Executive-QC-Member
Email ID – brijal.patel@bdrpharma.com Mobile no - 9726608582
3. Mr Pawan Srivastava, Vice-President-HR and Admin-Member
Email ID – pawan.srivastava@bdrpharma.com Mobile no - 8976969126
4. Mr Kartikeya Desai, Advocate-External Member.
Email ID kartikeya.desai@kartikeyaandassociates.com Mobile no –9820744358

The Committee shall inquire into any of the complaints received by it, in accordance with the P.O.S.H Policy and the Laws applicable and submit its report/recommendations to the Management for their action.

The tenure of this committee will be 3 years w.e.f. 14th Feb 2022 and the Employer may reconstitute/change/add/withdraw any members of the committee at any time as per terms of the Policy.

**'Internal Complaints Committee' as per Company policy for
Prevention of Sexual Harassment of Women (P.O.S.H) at
Workplace:**

The following 'Internal Complaints Committee' is constituted by the Company.

1. Dr Sangeeta, AGM-R&D-Presiding Officer
Email ID drsangita@bdrpharma.com Mobile no - 9725202635
2. Ms Dipal Chunawala, Dy. Manager-RA-Member
Email ID dparikh@bdrpharma.com Mobile no - 9725206026
3. Mr Pawan Srivastava, Vice-President-HR and Admin-Member
Email ID - pawan.srivastava@bdrpharma.com Mobile no - 8976969126
4. Mr Kartikeya Desai, Advocate-External Member.
Email ID kartikeya.desai@kartikeyaandassociates.com Mobile no -9820744358

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**'Internal Complaints Committee' as per Company policy for
Prevention of Sexual Harassment of Women (P.O.S.H) at
Workplace:**

The following 'Internal Complaints Committee' is constituted by the Company.

1. Ms Amita Pande, Manager-RA-Presiding Officer
Email ID - amita.pandey@bdrpharma.com Mobile no -
2. Ms Pooja Shinde, Manager-HR & Admin-Member
Email ID - pooja.shinde@bdrpharma.com Mobile no - 8511816498
3. Mr Pawan Srivastava, Vice-President-HR and Admin-Member
Email ID - pawan.srivastava@bdrpharma.com Mobile no - 8976969126
4. Mr Kartikeya Desai, Advocate-External Member.
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Prevention of Sexual Harassment of Women (P.O.S.H) at
Workplace:**

The following 'Internal Complaints Committee' is constituted by the Company.

1. Ms Sulakshana Pandit, DGM-Accounts-Presiding Officer
Email ID – spawar@bdrpharma.com Mobile no - 9820499937
2. Ms Rosley Joseph, BD-Member
Email ID – marketing@bdrpharma.com Mobile no - 7718884418
3. Mr Pawan Srivastava, Vice-President-HR and Admin-Member
Email ID – pawan.srivastava@bdrpharma.com Mobile no - 8976969126
4. Mr Kartikeya Desai, Advocate-External Member.
Email ID kartikeya.desai@kartikeyaandassociates.com Mobile no -9820744358

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