

	Document Title:	Prevention and Redressal Of Sexual Harassment at workplace policy		
	Document No.:		Eff. Date:	01.03.2024
	Process Owner	Human Resources		
	Revision No.:	07	Next Revision Date:	01.03.2025
	Prepared by: Neerajakshi Kommuri  Neerajakshi Kommuri (Mar 1, 2024 21:51 GMT+5.5)	Reviewed by: Ragothaman Raghunathan 	Approved by: Amarpreet Kaur Ahuja  Amarpreet Kaur Ahuja (Mar 3, 2024 20:21 GMT+5.5)	

For all purposes of this policy, the entities “AstraZeneca Pharma India Limited” and “AstraZeneca India Private Limited” shall be jointly referred to as “AstraZeneca India”.

1.0 Purpose:

We want AstraZeneca India to be a great place to work where everyone feels respected, supported, and safe. We protect our people and treat each other with dignity, supporting an inclusive workplace to free our diverse, uniquely talented employees to drive innovation and perform our best. Demeaning behaviours like Sexual harassment have no place in our company and are not tolerated under any circumstance.

Employees can also access the Global standard on Sexual harassment in the following link to familiarize the same [Global Standard on Sexual Harassment](#).

- 1.1 The Policy aims at evolving a permanent mechanism for prevention, prohibition and redressal of sexual harassment of any nature by an employee to another employee at the Workplace.
- 1.2 To sensitize the employees about the recognition of the rights of the other employees and their obligation towards the fellow employees to treat them with dignity and self-respect and to make them aware that company is determined to promote working environment in which persons of any gender compliment each other as equals.
- 1.3 To ensure complete compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder and uphold the commitment of AstraZeneca India to provide an environment free of discrimination of any nature of employees.
- 1.4 The Policy is Gender Neutral. The aim of the Policy is not only to address the complaint by a female employee against male employee but would also apply to a complaint of sexual harassment by employee of any gender against any other employee belonging to the same gender or another gender. However, any complaint received from other gender (excluding women) shall not fall under the ambit of POSH Act and management will have the discretion to inquire into the complaint appropriately including under this policy.

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2.0 Scope:

2.1 This Policy shall apply to all Full Time Employees of AstraZeneca India and also includes trainees, probationers, temporary, visitors and contractual staff and others who are engaged through Vendors and Service Providers in any capacity in relation to their work with AstraZeneca.

2.2 This Policy shall not only cover all types of sexual harassment at the workplace, but covers also any conduct involving employees outside the workplace which includes but not limited to working from home, while travelling in AstraZeneca India provided transport, business trips, external meetings, off site training programmes, social gathering of employees organised by AstraZeneca India etc. which comes under the definition of “notional extension of workplace”.

2.3 For the purposes of the Policy for Prevention and Redressal of Sexual Harassment at Workplace, hereinafter referred to as the “Policy”.

3.0 Definitions:

3.1 Complainant /Aggrieved Employee Refers to any employee who has lodged a complaint of sexual harassment at Workplace with the Internal Committee.

3.2 Implicated Person: Refers to any employee against whom the complaint of sexual harassment has been lodged with the Internal Committee.

3.3 Workplace: Includes all the offices of AstraZeneca India and departments, branches, depot/ distribution centre situated anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey, the places where the employees of AstraZeneca India have met for social, sports or extracurricular activities organized by AstraZeneca India. Any conduct involving employees outside the workplace which includes but not limited to working from home, while travelling in AstraZeneca India provided transport, business trips, external meetings, off site training programmes, social gathering of employees organised by AstraZeneca India etc. which comes under the definition of “notional extension of workplace”.

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3.4 Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely;-

- (i) Physical contact and advances; or
- (ii) A demand or request for sexual favours; or
- (iii) Making sexually coloured remarks; or
- (iv) Showing pornography; or
- (v) 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 amounts to Sexual Harassment: -

- (i) Implied or explicit promise of preferential treatment in employment; or
- (ii) Implied or explicit threat of detrimental treatment in employment; or
- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with the work or creating an intimidating or offensive or hostile work environment for the employee; or
- (v) Humiliating treatment likely to affect employee's health or safety

3.5 Internal Committee – Internal Committee constituted under this policy shall be treated as Internal committee as envisaged in the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act and Rules thereunder.

4. Responsibilities:

4.1 All employees are expected to:

- Follow the standards of behaviour outlined in this policy and immediately report acts of Sexual harassment the moment they become aware of the same.
- Offer support to people who experience sexual harassment, including providing information about how to make a complaint and direct them to the Internal Committee
- Avoid gossip and respect the confidentiality of complaint resolution procedures.
- Treat everyone with dignity, courtesy and respect.

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4.2 Managers and Supervisors are expected to:

- Promptly report complaints to the Internal Committee immediately and guide the aggrieved to reach out to the Internal Committee.
- Model appropriate behaviour.
- Educate team members about their obligations under the policy and the law
- Intervene and report when inappropriate behaviour is observed
- Enforce workplace behavioural standards and refer formal complaints for enquiry
- Ensure non-retaliation.

5. Internal Committee:

5.1 The management shall constitute Internal Committee consisting of the following:

- A Presiding Officer who shall be a woman employed at a Senior level at workplace from among the employees.
- Not less than two members from amongst employees
- One member from amongst non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to harassment at Workplace including Sexual Harassment.

5.2 The members of the Internal Committee along with their details are provided in *Annexure 1*

5.3 The management shall ensure that at least one half (50%) of the total members so nominated shall be women.

5.4 The Minimum number of members for the sitting in each case shall be four (04) in number including the Presiding Officer and the External Member (“Quorum”).

6 Reporting of Sexual Harassment (Complaint procedure)

6.1 Any Aggrieved Employee may make a complaint in writing, a complaint of harassment at Workplace to the Internal Committee giving the details of the harassment meted out to them within a period of 90 days from the date of the incident and in case of a series of incidents, within a period of 90 days from the date of last incident. The complaint by an Aggrieved Employee shall be sent either by post/email or given in person to the Presiding Officer of the Internal Committee or to any other

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Member of the Committee or to the Official email ID of the Committee which is published in Annexure 1 of this Policy.

6.2 The Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding 90 days, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period. In no event shall the extended time period to entertain the Complaint exceed ninety (90) days.

6.3 Where the employee is unable to make a complaint on account of his or her physical or mental incapacity or death or otherwise, his or her legal heir may make a complaint under this section. It is, however, pertinent to state that where the Aggrieved Employee is unable to make a complaint on account of his or her physical incapacity, a complaint may be filed by—

- (i) his or her relative or friend; or
- (ii) his or her co-worker; or
- (iii) any person who has knowledge of the incident, with the written consent of the Aggrieved Employee.

7 Procedure to be followed on receipt of complaint:

7.1 Upon any member of the Internal Committee receiving a complaint, remaining Internal Committee members who shall be a part of that inquiry shall be informed about the complaint and the Internal Committee shall determine if the allegations levelled are sexual in nature or not. Copy of the Complaint shall be shared with the Respondent within seven (7) days seeking his response within ten (10) days from the date of receipt of such notice.

7.2 The Internal Committee will inquire all stakeholders relating to the complaint based on the statements provided by them to ascertain the genuineness of the complaint and whether the allegations stand proved.

7.3 The enquiry shall be completed within a period of 90 days of receipt of the complaint.

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7.4 Where the enquiry is not able to be completed by 90 days due to unavoidable circumstances, the Internal Committee can record the same in their report.

7.5 During the pendency of enquiry, Internal Committee can recommend any Interim Relief as deemed fit to the complainant including but not limited to work from home, leave or change in location etc.,

7.6 Complainant and Implicated person shall be provided opportunity to present evidences and witnesses in their defense.

7.7 The Internal Committee shall ensure the principles of natural justice are followed during the course of the enquiry and upon completion of the enquiry.

7.8 The parties shall not be allowed to bring any legal practitioner to represent them at any stage of the inquiry proceedings before the Internal Committee.

7.9 On completion of investigation, Internal Committee shall prepare a written report which shall include a statement of factual findings and their recommendations to the Management for further action.

8 Implementation of the recommendations of the Internal Committee:

After completion of the enquiry, the Internal Committee shall forward its report with its recommendations to the Disciplinary Authority. The Disciplinary Authority shall examine the report and thereafter award the punishment if the allegations are Substantiated / partially substantiated in accordance with the Disciplinary Handling Policy of AstraZeneca India which includes Coaching and Counselling, First Warning, Final Warning and Termination of service /Dismissal as it may deem fit. The disciplinary action shall be completed by AstraZeneca India within 60 days of the receipt of the recommendations from the Internal Committee. However, if the allegations are not substantiated (unsubstantiated) then the committee may recommend no action and the disciplinary authority shall close the case with no further action.

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9 Confidentiality& Non- Disclosure:

The identity and address of the Aggrieved Employee, Implicated person and witnesses, any information relating to conciliation and enquiry proceedings, recommendations of the Internal Committee, the action taken by the employer shall be treated as confidential to the extent feasible and shall not be disclosed to anyone who is not authorized to receive the said information. Complainant, Respondent and Witness shall be bound by confidentiality obligations and shall not disclose to any third party, including without limitation Witness, HRBP, line Manger, Head of the Department etc.

10 Obligations of the Management:

- 10.1 The Management may also initiate action under the Indian Penal Code or any other law for the time being in force, against an Implicated person, where the Implicated person is not an employee of the establishment and there is complaint of Sexual Harassment against the said Implicated person in the Workplace where the harassment took place.
- 10.2 The Management will create awareness amongst employee on gender sensitivity and harassment free Workplace at periodic intervals in such manner they may deem fit.

11 Power and other functions of the Internal Committee

- 11.1 The Internal Committee shall have the powers of a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely :
- a) summoning and enforcing the attendance of any person and examining him on oath;
 - b) requiring the discovery and production of documents; and
 - c) any other matter which may be prescribed
- 11.2 The Internal Committee shall meet periodically and review the measures taken for creating awareness among the employees on gender sensitivity and suggest further measures for enhancing the level of sensitivity on the subject among the employees.

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12 Penalty:

12.1 Punishment for false or malicious complaint and false evidence.

Where the Internal Committee arrives at a conclusion that the allegation against the Implicated person is malicious, false or has produced any forged, fabricated or misleading document/s, it may recommend to the employer to take action against the Complainant in accordance with the disciplinary handling policy of Astra Zeneca.

12.2 Punishment for false evidence or producing forged or misleading documents:

Where the Internal Committee arrives at a conclusion that during the inquiry any witness (including the Complainant, Witness and/ or the Implicated person) has given false evidence or produced any forged, fabricated or misleading document, it may recommend to the employer to take action against such person.

12.3 Penalty for publication or making known contents of complaint and inquiry proceedings:

Where any person, entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action, publishes or makes known the contents of complaint or inquiry proceedings, he/she shall be liable for penalty in accordance with any breach of confidentiality the person concerned shall be liable for penalty in accordance with the provisions of service rules applicable to the said person or with any penalty as recommended by the Internal Committee which may be recovered from his/her salary.

13 Suspension pending enquiry:

Internal Committee at its discretion can direct the disciplinary authority to place the implicated person under Suspension pending enquiry till the completion of the enquiry or till any time before the completion of the enquiry as deemed fit, based on factors such as the sensitivity of the complaint, the safety of the complainant, and any other relevant considerations. During the period of suspension, the implicated person shall be paid salary as per the Disciplinary Action Policy and applicable laws.

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14 Recommendation of Internal Committee (Sanctions)

Internal Committee shall and as a part of the report shall recommended sanction which shall be consistent with the list of sanctions mentioned in Disciplinary Handling Policy. A closure discussion with the complainant/aggrieved employee will be conducted by AstraZeneca India to communicate and request them to report in case of any recurrence.

15 Disciplinary Authority:

Disciplinary Authority means, any officer duly delegated with the power shall function as the Disciplinary Authority for the purposes of this policy. AstraZeneca India may appoint or specify different disciplinary authority for employees at different levels or grades.

16 Non – Retaliation:

AstraZeneca India does not tolerate retaliation against anyone who makes a report or statement in good faith. The company will fully investigate reports of non-compliance with the Code and take proper disciplinary action, which may include termination.

17 Non- Waiver of the statutory rights

This policy and procedures document does not constitute a waiver of any of the statutory and common law rights / remedies available to both the parties and it shall be open to both parties to exercise any of their legal rights / remedies.

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Annexure 1
Internal Committee
AstraZeneca India Private Limited (AZIPL)
(Chennai and Bangalore)

Name of the Internal Committee Member	Role	Email
Vidhya Ramamurthy	Presiding Officer	vidhya.ramamurthy@astrazeneca.com
Rachita Gulati	Member	rachita.gulati@astrazeneca.com
Revathy Krishnan	Member	revathy.krishnan@astrazeneca.com
Govind Cheramkalam	Member	Govind.Cheramkalam@astrazeneca.com
Sukrita Paul	Member	Sukrita.paul@astrazeneca.com
Rama Dandina	Member	rama.dandina1@astrazeneca.com
Ranganathan Yadav SL	Member	ranganatha.yadavsl@astrazeneca.com
Sanjukta Roy	Member	sanjukta.roy@astrazeneca.com
Rashmitha V. Das	External Member	rashmitha.das@bcpassociates.com

Address for communication

Presiding Officer

Internal Committee (Prevention of Sexual Harassment Committee)

AstraZeneca India Private Limited

TRIL, Neville – GF, 10 & 11F, Cambridge – GF, 1, 4, 9,10F,

SEZ, Phase II, Ramanujan IT Park, Rajiv Gandhi Salai, Taramani, Chennai-600113, India.

Or

Block N1, 3rd & 5th Floor, Manyata Embassy Business Park,

Rachenahalli, Outer Ring Road,

Bengaluru – 560045

Email: INCH.ICC.POSH@astrazeneca.com or any member of the Internal Committee of AZIPL.

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Internal Committee
AstraZeneca Pharma India Limited (AZPIL)

Name of the Internal Committee Member	Role	Email
Gunjan Gupta	Presiding Officer	gunjan.gupta1@astrazeneca.com
Abhrajit Sen Gupta	Member	Abhrajit.Sengupta@astrazeneca.Com
Amita Yadav	Member	Amita.yadav@astrazeneca.com
Kirtan Bhatt	Member	kirtan.bhatt@astrazeneca.com
Minaxi Khalera	Member	minaxi.khalera@astrazeneca.com
Shilpi Tandon	Member	shilpi.tandon@astrazeneca.com
Kavita Surana	Member	kavita.surana@astrazeneca.com
Rajiv Dutt	Member	rajiv.dutt@astrazeneca.com
Jhansi Manchala	Member	manchala.jhansi@astrazeneca.com
Rashmitha V. Das	External Member	rashmitha.das@bcpassociates.com

Address for communication

Presiding Officer

Internal Committee (Prevention of Sexual Harassment Committee)

AstraZeneca Pharma India Limited

Block N1, 12th Floor, Mfar –7th floor, Manyata Embassy Business Park,

Rachenahalli, Outer Ring Road, Bengaluru – 560045, India

Email to ICAZPIL@astrazeneca.com or any member of the Internal Committee of AZPIL.

18 Disclaimer:

AstraZeneca India may change its Sexual Harassment Policy to comply with applicable laws. If there is a conflict between this Policy and the POSH Act, the POSH Act will always take precedence.

AstraZeneca India may make any alteration or amendment or rescind any clauses of this policy as and when it finds necessary to ensure complete compliance to the provisions of the applicable law and to ensure that the policy completely serves the purpose for which it has been laid down.

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This version of the policy shall supersede all the previous versions of the POSH policy.

19 Version Control

Version	Date	Description of Change
1.0	15.11.2014	New Policy Created
2.0	26.07.2016	Internal Committee change update
3.0	01.04.2018	Policy revised and Internal Committee change updated
4.0	30.10.2018	My HR Portal Project Team - Re-template / approved migrate to the My HR Portal
5.0	01.08.2023	Policy Revision and harmonisation of Policy with AZPIL and AZIPL.
6.0	14.11.2023	Internal Committee change update – AZIPL
7.0	01.03.2024	Internal Committee change update - AZPIL