

SOLARA ACTIVE PHARMA SCIENCES LIMITED

PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

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Policy Statement:

Solara Active Pharma Sciences Limited (hereafter referred to as "Solara") is committed to providing a safe and harassment-free work environment for all employees, associates, and visitors. This policy aims to prevent sexual harassment, address complaints effectively, and ensure redressal mechanisms are in place in line with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013."

Purpose:

To define guidelines that ensure secure information management and controlled usage of technology to enable Solara to operate securely while mitigating risks associated with information security threats.

1. To create and maintain a safe and discrimination-free workplace.
2. To educate all employees, associates, and contracted workforce about sexual harassment and the reporting process.

Scope:

This policy applies to all Solara employees, including trainees, consultants, and contract staff working across all locations but not limited to visitors/ vendors visiting any sites/ offices of Solara.

Abbreviations:

1. HR: Human Resources
2. POSH: Prevention of Sexual Harassment
3. ICC: Internal Complaints Committee

Definitions:

1. Sexual Harassment: Any unwelcome sexual behaviour, including physical contact, advances, requests for sexual favours, verbal or non-verbal conduct of a sexual nature.
2. Aggrieved Individual: Any employee or visitor who alleges harassment.
3. Respondent: Person against whom the complaint is made.

Procedures:

1. Complaints Mechanism under POSH act:
 - 1.1. Constitution of ICC: ICCs will be established at all Solara sites as per statutory requirements.
 - 1.2. ICC Members: Includes a presiding officer, at least two employee members, and an NGO member.
2. Violations of Code of Conduct in POSH includes:
 - 2.1. Eve-teasing, unsavoury remarks, and gender-based insults.
 - 2.2. Physical advances, unwelcome gestures, or verbal sexual overtures.
 - 2.3. Sharing offensive materials or making derogatory comments.
3. Complaint Registration Process:
 - 3.1. Complaints should be in writing and submitted within 3 months of the incident.

- 3.2. The ICC will investigate complaints within 90 days, with recommendations submitted to the employer
4. Conciliation and Settlement:
 - 4.1. Conciliation can be initiated upon request by the complainant but cannot involve any monetary solution/settlement.
5. Inquiry Process:
 - 5.1. ICC has powers similar to civil courts, including summoning witnesses and examining documents.
6. Actions during Inquiry:
 - 6.1. Interim relief such as transfer or leave for the aggrieved individual may be recommended by the ICC.
7. Inquiry Report:
 - 7.1. ICC will submit its findings within 10 days of inquiry completion, with recommendations for action.
8. Protection of Confidentiality:
 - 8.1. All complaint-related details will remain confidential, except for legal or justice purposes.

Responsibilities:

1. Employer:
 - 1.1. Provide a safe working environment.
 - 1.2. Organize awareness workshops and display POSH guidelines prominently.
 - 1.3. Ensure timely implementation of ICC recommendations
2. Human Resources:
 - 2.1. Assist the ICC during inquiries and ensure compliance with legal provisions.
 - 2.2. Facilitate training programs for employees and ICC members.
3. ICC:
 - 3.1. Conduct fair and impartial inquiries.
 - 3.2. Provide recommendations to the employer and follow up on implementation.

Reporting & Redressal:

1. Annual POSH reports summarizing complaints and resolutions will be prepared.
2. ICC members who disclose confidential information or breach ethical standards may be disqualified.

Review & Administration:

Solara reserves the right to amend or withdraw this policy without prior notice. The policy will be reviewed and updated as required to ensure compliance with evolving regulations and organizational needs.

References:

- The Sexual Harassment of Women at Workplace Act, 2013
- Code of Conduct and Business Ethics Policy
- HR Disciplinary Actions Matrix

Annexure:

ICC committee Details: Location wise as mentioned below (updated list to be added)