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**PREVENTION OF SEXUAL  
HARASSMENT AT WORK  
PLACE (POSH)**

**POLICY**



## VISION

# Access to precision Medtech for every patient, Globally.

## VALUES



### AGILE

To be able to quickly adapt to rapidly changing global environment & exploit opportunities to ensure faster accessibility for patients to precision medtech solutions



### INQUISITIVE

To have an eager desire to learn & seek new information & experiences that helps to achieve our vision of reaching out to every patient on this planet.



### COLLABORATIVE

To work together with both internal & external people by securing their support and forming alliances to give accessibility of precision medtech solutions to our end users

## STRATEGIC LEVERS



**Culture & Engagement**



**Pursuit of Excellence**



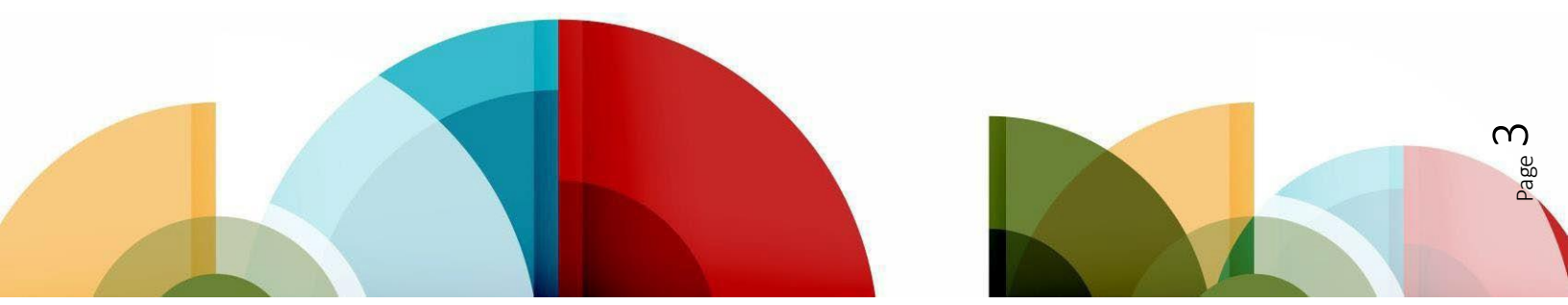
**Financial Vitality**



**Growth Acceleration**

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## Introduction

The occurrence of sexual harassment in the workplace in the Indian context, and guidelines on its prevention and deterrence were laid down by the Supreme Court in 1997. In keeping with these guidelines the Prevention of Sexual Harassment Policy was framed in Healthium Medtech Pvt. Ltd (HML) in November 2008.

Further, based on Sexual Harassment of Women at workplace (prevention, prohibition and redress) Act 2013 guidelines, policy has been formulated on what is considered to be sexual harassment and how to deal with such cases and redressal of complaints made to the Internal Complaints Committee (ICC).

## Commitment

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and with equal treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

## Scope

This policy applies to all categories of employees of the Company, including permanent management staff and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

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



## What constitutes sexual harassment?

Any unwelcome sexually motivated behaviour towards any employee or any other person at workplace of HML, such as the following constitutes sexual harassment:

- (i) Physical contact and advances,
- (ii) Demands or requests for sexual favors,
- (iii) Sexually colored remarks,
- (iv) Showing pornography,
- (v) Any other unwelcome physical, verbal or nonverbal (including e-mails, SMSs, etc) 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 behavior of sexual harassment may amount to Sexual harassment –

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

If in such a situation a threat is made of adverse consequences to a victim's physical well-being, or employment, the case will be dealt severely. Harassment is not always a directed act. Deliberately creating a hostile or humiliating working environment in a manner that is sexually discriminatory will also be considered as sexual harassment.

## DEFINITIONS

- (i) Aggrieved Person - In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- (ii) Respondent - Against whom the aggrieved person has made a complaint



- (iii) Workplace - Any place where working relationship and/or employer-employee relationship between the company and the person exists. This includes our premises (including transit houses & guest houses) and any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.
- (iv) Internal Complaints Committee (ICC) – Committee constituted as per the guidelines specified in the Act to address the grievances of Sexual Harassment.

### What to do if you feel you are being sexually harassed

know your rights? Sexual harassment is illegal, both the law of the land and HML prohibit sexual harassment.

Speak up? If you can, tell the person to stop. State clearly and firmly that you want a particular behaviour to cease.

Get information and support? If you feel you cannot speak up, ask your friends/ well-wishers/ family members to help you and bring it to the notice of ICC. Keep records that might be useful for pursuing the case.

### What not to do

Do not blame yourself. Sexual harassment is not something one brings on oneself. It is not a consequence of certain ways of dressing or acting. It is a violation of an individual's right to work and live with dignity.

Do not ignore it. Ignoring sexual harassment does not make it go away. The harasser may misinterpret a lack of response as approval of the behaviour.

Do not delay. Delay in action increases the probability that unwanted behaviour will continue or escalate.

Do not hesitate to ask for help. Speaking up may prevent others from being harmed as well.



## Internal Complaints Committee (ICC)

The Company has instituted Internal complaints committee for redressal of sexual harassment complaint and for ensuring time bound redressal of such complaints.

According to the guidelines, the complaints committee shall consists of the following members nominated by the employer -

1. Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.
2. Not less than two members from amongst the employees preferably committed to the cause of women
3. One members amongst non-governmental organization or association committed to the cause of women

Provided that at least one-half of the total members so nominated shall be women.

Internal Complaints Committee shall hold office for such period, not exceeding three years from the date of their nominations

The Internal Complaints Committee Meeting shall be held once in a quarter

## Complaint Redressal Process

- (i) The Aggrieved person should make, in writing, a complaint regarding any instances of sexual harassment at workplace to the ICC Member within a period of 3 (Three) Months from the date of last incident.
- (ii) The complainant shall duly submit six copies of the written complaint to the ICC. It should carry the names and addresses of the witnesses. It can be submitted along with the supporting documents, if any.
- (iii) If, it is not possible for the Complainant to make a written complaint, then the Presiding Officer or any other Member of the ICC as the case may be, shall render all reasonable assistance to the Aggrieved Person for making the complaint in writing.
- (iv) Further the ICC, for the reasons, to be recorded in writing, may extend the timeline not exceeding 03 (Three) Months, if it is satisfied, that the Complainant was prevented from making the complaint within the stipulated period.
- (v) Where the aggrieved person is unable to make a complaint on account of his/her physical or mental incapacity, a complaint may be field by his/her legal heir, friend, co-worker or relative or any other person who has the knowledge of the incident, with a written consent from the aggrieved individual.
- (vi) Where the aggrieved person is dead, a complaint may be filed by any person who has the knowledge of the incident, with the written consent of his/her legal heir.



## Procedure of Inquiry into Complaint received

- (i) Prior to the commencement of the enquiry proceedings, an attempt may be made for reconciliation, as it may possibly lead to an amicable resolution without having to initiate the enquiry proceedings.
- (ii) However, monetary settlement shall not be made as the basis for reconciliation. ICC shall not proceed with an inquiry, once a settlement has been made. The ICC shall record the settlement arrived at and provide copies of the settlement to the Aggrieved Woman as well as the Respondent.
- (iii) On receipt of the complaint, the ICC shall send a copy of the complaint received from the aggrieved person to the respondent within a period of seven working days.
- (iv) The respondent shall file his/her reply to the complaint along with his/her list of documents and names and addresses of witnesses, within a period not exceeding ten working days from the date of receiving the complaint copy.
- (v) The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.
- (vi) The ICC shall have the 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 Presiding officer, provided that such termination or *ex-parte* order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- (vii) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.
- (viii) In conducting the inquiry, a minimum of three members of the ICC including the Presiding officer shall be present.
- (ix) The Presiding Officer shall ensure that the complaint is attended immediately and the investigations are completed within 30 working days and recommendation shall be submitted to the Management.
- (x) The implementation of the recommendation of ICC should be done
- (xi) During the pendency of inquiry, on a written request made by the aggrieved person, the committee may recommend to the Management, to
  - ◆ Transfer the aggrieved person or the respondent to any other workplace or
  - ◆ Grant leave to the aggrieved person upto a period of three months (the leave granted shall be in addition to the leave he/she would be otherwise entitled) or
  - ◆ Grant such other relief to the aggrieved person as may be prescribed.





## Action for Sexual Harassment

This procedure of redressal is followed uniformly irrespective of the position held by the persons involved. The ICC on receiving a complaint constitutes an enquiry committee from within its members which attempts to find all facts related to a complaint. It is ensured that this committee consists of members who cannot be considered prejudicial and have little or no relationship to the accused.

This committee has the power to summon people involved in the case or whoever can provide information. However, the committee can reach a decision *in absentia* if the accused refuses to comply. After having considered the case further action is recommended within a stipulated time.

The recommended action can range from a verbal warning, to requiring the accused to undergo counseling, up to expulsion from HML. Where the conduct of the accused amounts to a specific offence under the Indian Penal Code or under any other law, HML shall initiate appropriate action in accordance with law.

The Presiding Officer of the ICC will make sure that the complaint is attended to with immediate effect and that the requisite enquiry proceedings are completed within 90 days from the date of registering the complaint. The Enquiry Report shall be submitted with the Management of HML within 10 days of completion of the enquiry. The Enquiry Report must be made available to the concerned Parties.

The implementation of the recommendations of ICC will be made by the Management of HML within 60 (Sixty) days of receipt of the Enquiry Report. The recommendations made by the ICC cannot be over-ruled subsequently by any employee of HML.

## Safeguard to those making complaints

ICC guarantees anonymity of complainants and all persons involved. All complaints will be dealt with equal seriousness irrespective of the positions held by the persons involved. In view of the complicated nature of sexual harassment, complaints will be considered even when it is difficult or impossible to provide concrete evidence.



## Implications for making wrong/false Complaints

If, it has been proved that the Complainant had filed a wrong/false complaint against the Respondent with a malicious intention and has deliberately produced any forged or misleading document with the ICC, it shall recommend the Management of HML to take appropriate action against the Person. However, the inability from the part of the Complainant to submit any adequate proof shall not attract any actions against the Complainant.

## Awareness Programs

1. Awareness programs to be conducted once in a year
2. Communication of Policy – Is part of Induction
3. Display Policy and constitution of Internal Complaints Committee

## Management Report

ICC shall in each calendar year prepare an Annual report every year and submit the same to the Management. The report should have the details of complaints reported and Action plan there on.

Email ID for POSH Committee to send the Complaints: [PoshCommittee@healthiummedtech.com](mailto:PoshCommittee@healthiummedtech.com)

## Internal Complaints Committee members – Peenya HO and Needle Factory

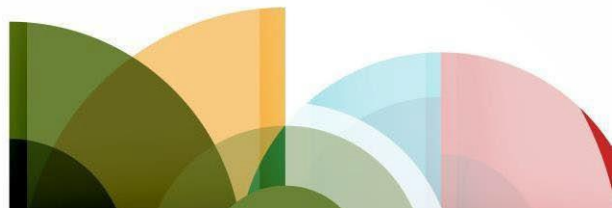
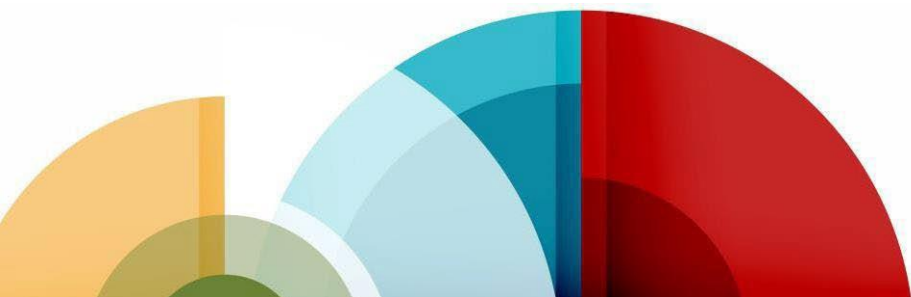
1. Presiding Officer - Ms. Bhanu Shivakumar – AVP – HR & IR
2. Member – Ms. Sumarani V – Deputy Manager - QC
3. Member - Ms. Renuka D L – Production Supervisor
4. Member - Ms. Rathna – Operator
5. Member – Ms. Netravathi – Operator
6. Member – Ms. Shyla – Operator
7. Member – Ms. Leelavathi – Operator
8. Member – Ms. Shymala – Operator (Needle Unit)
9. Member – Ms. Rukmini – Operator (Needle Unit)
10. Member – Mr. Anandnath Khairnar
11. External Member – Mrs. Sangeetha M S - Advocate

### Internal Complaints Committee members – Kunigal Plant

1. Presiding Officer - Ms. Bhanu Shivakumar – AVP – HR & IR
2. Member – Ms. Vasanth - Operator
3. Member - Ms. Yamuna R – Operator
4. Member – Ms. Mangamma - Operator
5. Member - Ms. Shashikala C – Operator
6. Member – Ms. Rashmi B R– Operator
7. Member – Ms. Veena Kumari - Operator
8. Member – Ms. Umadevi – Operator
9. Member – Mr. Kalyana Rengan – AVP Manufacturing
10. Member – Ms. Shilpa K P - Operator
11. External Member – Mrs. Sangeetha M S - Advocate

### Internal Complaints Committee members – Sricity Plant

1. Presiding Officer - Ms. Bhanu Shivakumar – AVP – HR & IR
2. Member – Mr. Sandeep Sahare – DGM - Production
3. Member - Ms. Priyadarshini – Officer QC
4. Member – Ms. Hemashri – Operator
5. Member – Ms. Anitha B – Operator
6. External Member – Ms. Usha T V Reddy




## Internal Complaints Committee members – Corporate Office & Sales

1. Presiding Officer – Kankana Barua – Group CHRO
2. Member - Ms. Vidhya G G – Manager – Metro vigilance
3. Member – Mr. Madhurya Pukhan – VP - Marketing
4. Member – Mr. Subir Nityaranjan Das – AVP – Arthroscopy
5. Member- Ms. Pallavi Karkera – Company Secretary
6. External Member – Mrs. Sangeetha M S - Advocate

### Contact numbers are as below:

1. Ms. Bhanu Shivakumar – AVP – HR & IR – 9741128589
2. Ms. Kankana Barua – Group CHRO - 9845523671
3. Mr. Anandnath Khairnar – AVP – Manufacturing – Peenya – 9900047606
4. Mr. Sandip Sahare – DGM Manufacturing – Sricity – 9052594477
5. Mr. Kalyana Rengan – AVP Manufacturing – Kunigal - 9900048931

### SIGN OFF:

Date	16-06-2022
Revision No.	01
Authorised and signed by: Mr. Anish Bafna & Ms. Kankana Barua	
CEO	
CHRO	