

CHEMVEDA

POSH POLICY

Document Governance		
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Entities covered	Chemveda Life Sciences India Pvt. Ltd.	
Owner	Human Resources Department	
Revision History	Earlier Version: 00 Date of Revision: NA Revision Effective Date: NA	Policy Approved By: CEO Dr. Bheema Rao Paraselli <i>P. Bheema Rao</i> 11-Sept-2025

1.0 PURPOSE:

To define the guidelines and process to be followed in order to provide protection against sexual harassment of Women at the workplace and for the prevention and redressal of complaints of sexual harassment.

2.0 SCOPE:

This policy is applicable to all employees of Chemveda Lifesciences India Pvt. Ltd. and covers all employees, including permanent staff, trainees, and contract employees at its workplace or client sites.

3.0 RESPONSIBILITY:

S. No	Department	Responsibility
➤	Complaints Committee	<ul style="list-style-type: none"> Investigating every formal written complaint of sexual harassment. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment. Discouraging and preventing employment-related sexual harassment.
➤	Employees	<ul style="list-style-type: none"> All employees have a personal responsibility to ensure their behavior is not contrary to this policy.
➤	Presiding Officer	<ul style="list-style-type: none"> Presiding Officer will determine whether the allegations made in the complaint fall under the purview of sexual harassment. To investigate the allegations with the assistance of the Complaints Committee.

4.0 DEFINITIONS:

Any unwelcome acts or behavior - verbal, non-verbal, physical, sexual from persons of the same or opposite sex. Behavior that offends the dignity of the individual to whom it is directed, a demand or request for sexual favors.

5.0 PROCEDURES/RULES/PROCESS:

➤ General Principles

- **Prevention:** Establishing a clear definition of sexual harassment and implementing measures to prevent it.
- **Awareness:** Promoting awareness and sensitivity among employees regarding sexual harassment.
- **Internal Complaints Committee (ICC):** Providing an accessible and confidential complaints mechanism, ensuring a time-bound inquiry process.
- **Protection:** Assuring complainants against retaliation, providing a safe and harassment free work environment.

➤ Complaint mechanism

- Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

➤ Complaint Committee

- The company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints as per Section 4 of the SHWW Act read with its rules.
- Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least three members will be women:
 - Management Team member (**Presiding Officer**)
 - Two women members (Member)
 - One Male member (Member)
 - Member from a Non-Governmental Organization or Lawyer (Member)
- Every member of the ICC shall hold office for a period not exceeding three years from the date of their nomination as may be specified by the management.
- ICC would be strictly governed by Section 4 of SHWW Act.

➤ **Procedure for filing a Compliant**

- Complaint should be made by an aggrieved woman within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from last incident.
- The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period. Where the employee is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make a complaint under this section.
- Employees It is however pertinent to state that where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by –
 - Her relative or friend;
 - Her co-worker; or
 - An officer of the National Commission for Women or State Women's Commission.
 - Any person who has knowledge of the incident, with the written consent of the aggrieved woman;
- Where the aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by –
 - Her relative or friend;
 - A special educator; or
 - A qualified psychiatrist or psychologist; or
 - The guardian or authority under whose care she is receiving treatment or care; or
 - Any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.

➤ **Procedures for resolution, settlement or prosecution of acts of sexual harassment:**

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

- Informal resolution options

- When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.
- The ICC would go through the details of the complaint and evaluate if there is a prima facie case or not. While doing that ICC will keep in mind that complainant employee (CE) is not subject to enquiry more than once. However, if the complaint complexity requires that the CE is to be called for enquiry more than once, then utmost sensitivity should be displayed and adequate precaution would be taken to ensure that there is no loss of dignity to the CE.
- The ICC will initiate detailed enquiry as deemed fit.
- The ICC may, before initiating an enquiry and at the request of the CE, take steps to settle the matter between her and the Respondent employee (RE) through conciliation provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement has been arrived during conciliation, the ICC shall record the settlement and forward to the employer or District Officer. However, if the terms arrived during conciliation have not been complied with by the RE, the ICC shall proceed to make an enquiry into the complaint or as the case may be forward the complaint to the police. The copies of the settlement as recorded during conciliation shall be provided to both the parties.
- **Complaints:**
 - 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 Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 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 is working in, to enable the Presiding Officer to contact her and take the matter forward.

- The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, s/he will record this finding with reasons and communicate the same to the complainant.
- If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Complaints Committee.
- Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Management as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Management will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- Corrective action may include any of the following:
 - Formal apology
 - Counseling
 - Written warning to the perpetrator and a copy of it maintained in the employee's file
 - Change of work assignment / transfer for either the perpetrator or the victim.
 - Suspension or termination of services of the employee found guilty of the offence
 - In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

➤ **CONFIDENTIALITY:**

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.

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

➤ **ACCESS TO REPORTS AND DOCUMENTS:**

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.

➤ **PROTECTION TO COMPLAINT/VICTIM:**

- The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
- The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

➤ **CONCLUSION:**

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

➤ **COMPLAINTS COMMITTEE:**

Name of the member	Department	Role	Email ID
Ms. Prathyusha Guntupally	Management	Chairperson	Prathyusha.guntupally@chemvedals.com
Ms. Sandhya Pusunuri	HR	Member	Sandhya.pusunuri@chemvedals.com
Ms. Mansi Thumar	BD	Member	mansi.thumar@chemvedals.com
Mr. Anil Babu B	Legal Advisor	Member	bogudamedi.anil@gmail.com
Mr. N. Venkat Kaundinya	HR	Member	venkat.k@chemvedals.com