

MOREPEN LABORATORIES LIMITED

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PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

COMMITMENT:

Morepen Laboratories Ltd. ('Morepen') strives to create and maintain a healthy, safe and productive work environment, free from discrimination and harassment. Morepen directs its actions to ensure that everyone who visits our workplace, experiences an environment that not only promotes diversity and equality but also mutual trust, equal opportunity and respect for human rights. Morepen does not tolerate any form of discrimination, victimization, or harassment including Sexual Harassment and it is committed to take all necessary steps to ensure that nobody is subjected to any kind of harassment and free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at workplace, that includes prohibition and redressal of sexual harassment if it occur. At Morepen, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company

POLICY STATEMENT:

At Morepen, we are committed to providing a safe, respectful, and inclusive work environment free from sexual harassment. We uphold a zero-tolerance policy towards any form of sexual harassment and are dedicated to ensuring that all employees, regardless of their position, are treated with dignity and respect.

Sexual harassment in any form—verbal, physical, visual, or otherwise—is strictly prohibited. This includes unwelcome advances, requests for sexual favors, and any other conduct of a sexual nature that creates an intimidating, hostile, or offensive work environment.

All employees, contractors, consultants, and visitors are expected to adhere to this policy. We encourage anyone who experiences or witnesses' sexual harassment to report it immediately. All reports will be taken seriously and investigated promptly and

confidentially. Retaliation against individuals who report sexual harassment or participate in an investigation is strictly prohibited.

SCOPE:

This policy is applicable to all Employees of the Company across various locations. This policy considers the definition of Right to life, under the Constitution of India. It means right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a "safe" working environment where employees feel secure and truly believe that their dignity is maintained.

Complaints relating to Sexual Harassment against women at Workplace (as defined under the Act) shall be dealt with in accordance with the provisions of the Act. Complaints involving harassment/discrimination, including sexual harassment, against persons other than women [including men and LGBTQ+] shall be dealt with in accordance with our Respect, Dignity and Fair Treatment Policy under our Code of Business Principles. This policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and its rules notification published on 9th December 2013.

This Act is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

What constitutes Sexual Harassment?

Sexual harassment refers to unwelcome sexual advances or verbal or physical conduct of a sexual nature which has effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, abusive or offensive working environment (ILO Thesaurus, 2011).

Under Section 354 A (ILO) any act of sexual harassment includes

- i. physical contact and advances involving unwelcome and explicit sexual overtures; or
- ii. a demand or request for sexual favours; or
- iii. showing pornography against the will of a woman; or
- iv. making sexually coloured remarks.
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature, unwanted conduct, and about unequal power relations

Section 354 C (voyeurism): “Any man who watches or captures the image of a woman engaging in a private act in circumstances where she would usually have the expectation of not being observed either by the perpetrator or by any other person at the behest of the perpetrator or disseminates such image.

Section 354 D (stalking): “Any man is said to commit the offence of stalking when he i) follows a woman and contacts or attempts to contact such woman to foster personal interaction repeatedly despite a clear indication of disinterest by such woman, or ii) monitors the use by a woman of the internet, email or any other form of electronic communication, or iii) watches or spies on a woman in any manner that results in a fear of violence or serious alarm or distress in the mind of such woman or interferes with the mental peace of the woman.

Section 375 (rape): A man is found to have committed rape as defined if it is:

- without her consent
- against her will
- when her consent is taken by fear of death or hurt
- when her consent is taken by pretending to be her husband when he is not
- when her consent is taken when she is under the influence of drugs or drinks
- when she is mad or weak of mind and is not able to understand what the man is going to do
- with or without consent when her age is below 18 years
- when she is unable to communicate consent

Section 509: For the offence under this section intention to outrage the modesty of the women or knowledge that the act of the accused would result in outraging her modesty is the gravamen of the offence.

Verbal form	Physical form
<ul style="list-style-type: none"> • Gender based insults or sexist remarks • Sexual or gender-based jokes or teasing • Innuendos and taunts • Unwelcome sexual overtone in any manner such as over telephone 	<ul style="list-style-type: none"> • Unwelcome hugging, sexual touching or kissing • Forcible physical touch or molestation • Standing too close to or brushing up against another person, leaning over, invading a person's space

<p>(obnoxious telephone calls) and the like</p> <ul style="list-style-type: none"> • Requesting sexual favours • Telling lies or spreading rumors about a person's personal or sex life 	<ul style="list-style-type: none"> • Patting, stroking, grabbing or pinching • Blocking someone's path with the purpose of making a sexual advance
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Verbal form	Physical form
<ul style="list-style-type: none"> • Pressure for dates • Comments about clothing, personal behavior, or a person's body • Graphic descriptions of pornography. 	<ul style="list-style-type: none"> • Rape or attempted rape • Actual or attempted sexual assault, or forced fondling.
Visual form	Non-verbal form
<ul style="list-style-type: none"> • Presence of sexual visual material such as posters, cartoons, drawings calendars, pinups, pictures, computer programmes of a sexual nature • Written material that is sexual in nature, such as notes, SMS, E-mail containing sexual comments • Knick-knacks and other objects of a sexual nature. 	<ul style="list-style-type: none"> • Staring • Sizing up a person's body (looking up and down) • Derogatory gestures of a sexual nature • Sexually suggestive looks • Facial expressions of a sexual nature; winking, licking lips • Stalking.

Aggrieved Individual: An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

Complainant: A Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

Employee: An Employee means a person employed with the Company for any work on permanent, temporary, part time, adhoc or daily wage 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 on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Respondent: A Respondent means the person against whom the Complainant has made a complaint.

Special Educator: A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

Workplace: Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.

- Places visited by the Employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

INTERNAL COMPLAINT COMMITTEE

As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal), Act, 2013 “Every employer of a workplace shall, by an order in writing, constitute a committee to be known as the Internal Complaints Committee”.

The internal Committee shall consist of the following members to be nominated by the employer:

- a) Presiding Officer: Who shall be a woman employed at a Senior Level.
- b) Senior Member
- c) Female Member
- d) External Member: One member from amongst NGO or associations or familiar with the issue relating to the sexual harassment.

(One Half of the total members so nominated shall be women)

COMPLIANT PROCEDURE

- i. A Complainant can make, in writing, a complaint of Sexual Harassment to the Internal Complaints Committee (ICC), within a period of three 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. 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
- ii. were such which prevented the Complainant from filing a complaint within the said period.
- iii. Complaints of sexual harassment will be handled and investigated under the Company's grievance policy, unless special procedures are considered appropriate.
- iv. All complaints of sexual harassment will be investigated promptly as per the Investigation Procedure and in as impartial and confidential manner as possible.
- v. Employees are required to cooperate in any investigation.
- vi. Each complaint should be resolved within a period of 3 months of the complaint and communicated to the parties involved.
- vii. Any employee utilizing the compliant procedure will be treated courteously.
- viii. A person knowingly making a false claim shall also be subject to disciplinary action.

Below is the procedure for investigation of any written complaint received.

- No anonymous complaints against any individual should be accepted or action taken on the same.
- Once a complaint of sexual harassment is brought to the committee, it must be registered immediately, and a written complaint filed.
- The Chairperson of the Internal Complaints Committee should convene a meeting of the Committee within 48 hours of receipt of complaint.
- A quorum should be maintained for the Complaints Committee meeting, which stipulates 50 per cent attendance of the members. The presence of Chairperson is mandatory.
- According to the principles of natural justice:

- The alleged harasser should be informed of the complaint against him/her. It is suggested that the harasser should be informed of the complaint against him/her via a formal charge sheet.

THE INVESTIGATION PROCESS

The process should provide a fair method for both sides to be heard and to receive information. The employer and its investigator should not prejudge the alleged harasser's guilt. Witnesses should be interviewed as soon as possible. All responses should be documented and, if possible, statements should be written and signed by the person providing the information. In addition, all participants in the investigation should be reminded that their cooperation and confidentiality are required.

Interviewing the involved parties

- The investigator should be prepared to deal with the complaining employee's embarrassment and anger by patiently, but firmly, explaining that details are needed for an accurate investigation.
- The complaining party should be interviewed first, to ensure that all important details and witnesses are identified promptly.
- It is important for interviewers to be objective and non-judgmental and allow the alleged harasser to respond to each allegation. The investigator also should inform him of the type of disciplinary action that may be taken if the allegations are found to be true.
- Both parties should be told to avoid contact with one another, and ways to minimize contact should be implemented.
- The complaining employee should be encouraged to report any further incidents of harassment or retaliation.
- Witnesses should be told as little as possible about the details of the complaint in order to reduce the employer's exposure to later claims of defamation.
- The investigator should recognize that there might be no eyewitnesses. Thus, the employer may have to resolve a sexual harassment claim based on the credibility of the parties.

External Complaint Options

Employees have the right to make a complaint to the State Human Rights Commission. In a case of alleged sexual assault, employees have the right to make a complaint to the nearest Police Station.

What Rights Does an Alleged Offender Have?

Alleged offenders have the right:

- To be informed that a complaint has been filed.
- To have a copy of the complaint, stating the allegation(s) and the name of the complainant.
- To respond to the allegation(s).
- To be accompanied during investigative interviews by a co-worker, or another support person.
- To be informed in writing of the ICC's decision on what action, if any, will be taken and the reasons for that decision.