

Haleos Labs Limited

(Formerly known as "SMS Lifesciences India Limited")

Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

Introduction

Workplace sexual harassment is a form of gender discrimination which violates a woman's fundamental right to equality and right to life, guaranteed under Articles 14, 15 and 21 of the Constitution of India ("**Constitution**").

Workplace sexual harassment not only creates an insecure and hostile working environment for women but also impedes their ability to deliver in today's competing world. Apart from interfering with their performance at work, it also adversely affects their social and economic growth and puts them through physical and emotional suffering. This policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**Act**") and the Rules framed thereunder.

Accordingly, Haleos Labs Limited (**the "Company"**) has formulated this policy to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

This Policy shall be available at the website of the Company at haleoslabs.com/policies

Commitment

Our Company is committed to provide an environment that ensures that every woman, whether an employee or not is treated with dignity and respect and afforded equitable treatment within the premises of the Company.

The Company is also committed to promote a work environment that is conducive to the professional growth of its women 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 women in the premises of the Company whether employees or not are not subjected to any form of harassment.

Applicability

This policy applies to all women coming to the premises of the Company, whether employees or not. However, the respondent has to be an employee of the Company, whether permanent, workmen, casual employees, trainees and employees on contract at its workplace.

- * **The Content of this policy is deemed to be incorporated in the service contract of all employees.**

Definitions

In this Policy, unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meaning assigned to them, as under:

- ✚ **“Aggrieved woman”** means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- ✚ **‘Complainant’** means any aggrieved woman who makes a complaint alleging sexual harassment under this policy.
- ✚ **‘Employee’** means a person employed at a workplace for any work on regular, temporary, ad hoc 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.
- ✚ **“Employer”** means any person responsible for the management, supervision and control of the workplace. The term ‘management’ includes a person or Board or Committee responsible for formulation and administration of policies for the Company.
- ✚ **“Respondent”** means a person against whom a complaint of sexual harassment has been made by an aggrieved woman under this policy.
- ✚ **“Sexual harassment”** may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes (whether directly or by implication):

- Unwelcome sexual advances (verbal, written or physical).
- Demand or request for sexual favours.
- Any other type of sexually-oriented conduct.
- Verbal abuse or ‘joking’ that is sex-oriented.
- Making sexually coloured remarks.
- Showing pornography.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- ✚ **'Workplace' means** any premises, locations, offices, branches or factory / units, subsidiaries which is under the control of the Company **(including remote or digital workspaces also).**

Responsibilities

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

It can be done by:

- ✚ refusing to participate in any activity amounting to harassment.
- ✚ supporting the person to reject the unwelcoming behavior.
- ✚ acting as a witness if the person being harassed decides to lodge a complaint.

- * **At times, certain behaviors may not be intentional. While this does not excuse the conduct, it does offer the individual an opportunity to reflect, correct and cease such inappropriate behavior.**

Internal Complaints Committee (ICC)

The Company has instituted an Internal Complaints Committee (ICC / Committee) for redressal of sexual harassment complaint (made by an aggrieved woman) and for ensuring time bound treatment of such complaints. The Internal Complaints Committee will comprise of the members not less than three in number, out of which at least 2 members will be women for a period of 3 years.

Details available on the website of the Company @ haleoslabs.com/contact-us/

The Complaints Committee is responsible for:

- ✚ 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.

Procedures for Resolution, Settlement or Prosecution.

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

A. Informal Resolution Options:

When an incident of sexual harassment occurs, the aggrieved woman can communicate her disapproval and objections immediately to the harasser and alert the harasser to behave decently.

If the harassment does not stop or if the aggrieved woman is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the ICC for redressal of her grievances. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Formal Complaints:

Any aggrieved woman 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 ICC constituted by the Company.

- ✚ 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 aggrieved woman can send complaint through an email.
- ✚ The complainant is required to disclose her name, department, division and location she is working in and such other details to enable the Committee to contact her and take the matter forward.
- ✚ The 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 mean an offence of Sexual Harassment, the Committee will record this finding with reasons and communicate the same to the complainant.
- ✚ If the Committee determines that the allegations constitute an act of sexual harassment, it will proceed to investigate the allegation. 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 Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director of the Company and the functional head of the respective division or unit as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint.
- ✚ The Managing Director or respective functional head shall ensure corrective action on the recommendations of the Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- Formal apology & Counselling
- 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 identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, which is not to be published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action.

Protection to Complainant / Aggrieved Person

The Company is committed to ensuring that no employee who brings forward a harassment concern is subjected to any form of reprisal.

Any reprisal will be subject to disciplinary action. The Company will ensure that complainant 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.

Appeal

Any Complainant aggrieved by the decision of the Committee may prefer an appeal to the court or tribunal within 90 days from the date of communication of recommendations.

Any person aggrieved from the recommendations of the Committee or from non-implementation of such recommendations, may prefer an appeal to the Industrial Tribunal.

Awareness

Widely disseminate this policy for the prohibition, prevention, and redressal of sexual harassment at the workplace. This is intended to promote gender-sensitive safe spaces and eliminate underlying factors that contribute to a hostile work environment against women.

Carry out orientation programs and seminars specifically designed for the Members of the Committee to ensure they are well-informed about their roles, responsibilities, and the procedures outlined in the policy.

Legal Compliance

The Committee shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the Company and the District Officer.

This policy was originally adopted on 25th May, 2017 & was amended by the Board of Directors at its meeting held on 11th August, 2025, as per the recommendation of the Audit Committee.

(Only the name of the Company has been updated pursuant to name change of the Company)