	Issued by:	The Apex Disciplinary Committee	Version	6.0
	Prevention of Sexual Harassment Policy - POSH		Effective Date	01 May 2025

	Name	Position	Signature and date
Prepared by	Reshma Karmarkar	Corporate Compliance Manager and Convenor Apex Disciplinary Committee	DocuSigned by: Reshma Karmarkar 9A8F1C7094CB427... 02-May-2025 2:42 PM IST
Reviewed by	Seema Grover	Finance Head - EM & GG India And Chairperson Apex Disciplinary Committee	DocuSigned by: <i>Seema Grover</i> 7E694F0A0F2C46D... 02-May-2025 2:43 PM IST
	Krishna Venkatesh	Global Head of Quality and Pharmacovigilance	DocuSigned by: Krishna K Venkatesh 358396A9FAD146B... 04-May-2025 6:29 AM IST
	Archana Bhaskar	Chief Human Resources Officer	DocuSigned by: <i>Archana</i> EA8DC7E530D04F1... 07-May-2025 1:13 PM IST
Approved by	Erez Israeli	Chief Executive Officer	DocuSigned by: Erez Israeli 0836F629EB3146E... 08-May-2025 6:33 AM IST
	G V Prasad	Co-Chairman & Managing Director	DocuSigned by: <i>GM</i> FEC1AFAA39BC486... 08-May-2025 6:58 AM IST

Version #	Reasons for Change
6.0	<ul style="list-style-type: none"> Update to reflect the change in Chairperson: Seema Grover - Finance Head - EM & GG India has took over the responsibilities of Chairperson for POSH Apex Disciplinary Committee in place of Kajal Bhambhani. Update to reflect the amended legal reference. Clarity on revision timelines: Policy revision once in 3years.


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I. OBJECTIVE

The objective of this policy is to create a framework that intends to prevent sexual harassment at the workplace and to define a system to deal with any reported incidents of sexual harassment.

This policy is applicable to all India Dr. Reddy's Laboratories Limited (DRL) and its subsidiary employees too (e.g. APSL-Aurigene Pharmaceutical Services Limited) (**The policy is to be read with applicable local laws**) including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, interns and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours. This policy does not prevent any aggrieved person from taking recourse to the law of the land.


II. APPLICABILITY

Dr. Reddy's Laboratories Ltd. is committed to providing all its employees an equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability, as the case may be. In order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" of India (hereinafter referred to as the "Act") and existing rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "Rules").

Definitions

(a) "Aggrieved Individual" means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.

(b) "Complainant" is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, 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.

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(c) "Employee" as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

(d) "Employer" means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees.

(e) "Internal Committee" means and include members of an Internal Committee (hereinafter referred to as the "IC").

The IC composition is as per statutory provisions and shall follow all guidelines per the IC SOP.

The minimum quorum for each case shall be 3 IC members.

(f) "Member" means an internal member of the IC.

(g) "Presiding officer" means the presiding officer of the IC and shall be a woman employed at a senior level at the workplace amongst the employees.

(h) "Respondent" means a person against whom a complaint of alleging sexual harassment has been made under this policy.

(i) "Parties" means collectively the complainant and the respondent.

(j) "Sexual Harassment" includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):

A. Any unwelcome sexually determined behavior or pattern of conduct that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely -


(i) Physical contact and advances;

(ii) Demand or request for sexual favours;

iii) making sexually coloured remarks or remarks of sexual nature about a person's clothing or body;

(iv) showing pornography;

(v) Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including

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but not limited to cat-call, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text

messages, e-mails, gestures etc. Sexual harassment can involve a series of incidents or it can be a one-off occurrence.

B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behavior of sexual harassment may amount to sexual harassment:

- i. - Implied or explicit promise of preferential treatment in employment; or
- ii. - Implied or explicit threat of detrimental treatment in employment; or
- iii. - Implied or explicit threat about the present or future employment status; or
- iv. - Interference with work or creating an intimidating or offensive or hostile work environment
- v. for the person; or
- vi. - Humiliating treatment affecting any person's health or safety.

(k) "Workplace" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.


III. DUE DILIGENCE PROCESS

Complaint of Sexual Harassment

Raising of complaint

(1) Any aggrieved individual may make in writing, a complaint of sexual harassment to the IC at Internalcomplaintscommittee@drreddys.com or can login into <http://drreddys.ethicspoint.com>

(2) within a period of three months from the date of incident and in case of more than one incident, within a period of three months from the date of last incident. However, the IC may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further three months, if it is satisfied that bonafide circumstances prevented the aggrieved individual from filing complaint within the time limit mentioned hereinabove. Complaints received after the period of 6 months, will require a valid reason for delay and shall be addressed as per internal policy. The complainant should clearly mention name and available details of both the aggrieved person and the respondent. The complaint should contain supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

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Anonymous or pseudonymous complaints will not be investigated by the IC. They shall be forwarded to HR for appropriate redressal.

(3) Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative, as more fully described under Rule 6 of the said Rules, may make a complaint.

Redressal Process

Conciliation

Before the IC initiates an inquiry, the complainant may request the IC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC.

Inquiry


In case where a settlement is not feasible or could not be arrived at through conciliation the IC will conduct an inquiry into the complaint. Additionally, an inquiry may also be initiated if the aggrieved person informs the IC that any terms of settlement has not been complied with by the respondent.

The IC within seven working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.

The respondent within ten working days of receiving the complaint shall file his/her reply to the complainant along with list of supporting documents, names and addresses of witnesses.

The IC shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC. IC shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.

In the event of failure to attend personal hearing before IC by the complainant or the respondent on three consecutive dates (intimated in advance) without sufficient cause, the IC shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party, fifteen days in advance, before such termination or the ex-parte order.

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The inquiry process shall be completed maximum within the period of ninety days from the date of receipt of the complaint.

The IC within ten days from the date of completion of inquiry shall provide a report of its findings and recommendations to Management and findings shall also be forthwith made available to the complainant(s) and respondent(s). Management to implement action as per recommendations of the IC/ADC within 60 days and send intimation to chairperson for closure of the matter.

Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code (45 of 1860) or under any other law; it shall be the duty of IC to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this Policy.

Interim Relief


During pendency of the inquiry, on a written request made by the complainant, the IC may recommend to the employer to:

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restraint the respondent from reporting on the work performance of the complainant.

Prohibition on disclosure of information

This policy and the law prohibits any person including IC Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the IC during the proceedings under the provisions of the Act.

Any violation thereto shall also be subject to applicable disciplinary action. Further IC shall impose monetary sanctions as per provisions of the Act and Rules.

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Third Party Harassment

If an aggrieved individual brings to the notice of the IC any instances of sexual harassment where the Respondent is not an employee or other individuals covered under this policy, the Management or any person delegated by the Management shall provide assistance to the aggrieved individual, if such aggrieved individual so chooses, to file a complaint with the IC of the respondent's employer or under the IPC or any other law for the time being in force, as may be appropriate.

Protection to Complainant

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

False Complaints

Anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue and/or produces any forged or misleading document) will be subject to applicable disciplinary action upto and including termination of services.

Appeal


Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and Rules.

Disciplinary Proceedings

Pursuant to written recommendation by Management on the basis of report and findings of IC necessary disciplinary proceedings may be initiated against the respondent for the misconduct in terms of the applicable provisions of the Act.

Such actions may include any of the following, or a combination of the below mentioned statutory actions:

- a) Written apology
- b) Warning Letter with consequences
- c) Counselling
- d) Withholding of promotion

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- e) Withholding of pay rise or increments.
- f) Termination of employment

Compensation: the IC can also recommend monetary compensation in favour of the Complainant by way of deduction from the salary or wages of the Respondent, for an amount that it may consider appropriate to be paid to the Complainant in accordance with applicable law.

Relevant Sections :

Sexual Harassment: The Bharatiya Nyaya Sanhita mirrors the existing provisions and penalties under the IPC for sexual harassment, ensuring consistency in addressing sexual harassment offenses. A summary of the offences and punishments for the same is as below:

i. Assault to Outrage Modesty (Section 73, BNS Act):

- a. Unchanged from IPC Section 354.
- b. Punishment: Imprisonment for one to five years, with a fine.

ii. Sexual Harassment (Section 74, BNS Act):

- a. Acts: Unwelcome physical contact, explicit advances, demands for sexual favors, non-consensual display of pornography, and sexually colored remarks.
- b. Punishment: Unchanged from IPC – up to three years' rigorous imprisonment, or a fine, or both for (i), (ii), and (iii); up to one year's imprisonment, or a fine, or both for (iv).

iii. Assault with Intent to Disrobe (Section 75, BNS Act):


- a. Punishment: Unchanged from IPC – Imprisonment for not less than three years but may extend to seven years, along with a fine.

iv. Voyeurism (Section 76, BNS Act):

- a. Criminalizes unauthorized capturing or dissemination of private images.
- b. First conviction: Imprisonment for one to three years with a fine.
- c. Subsequent convictions: Imprisonment for three to seven years with a fine.

v. Stalking (Section 77, BNS Act):

- a. Defines stalking as unwanted pursuit, including online monitoring.
- b. First conviction: Imprisonment up to three years with a fine.
- c. Subsequent convictions: Imprisonment up to five years with a fine.

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vi. Insult to Modesty (Section 78, BNS Act):

a. Punishment: Simple imprisonment up to three years with a fine.

Section 75 of Bharatiya Nyaya Sanhita

Definition of Section 75 BNS

(1) A man committing any of the following acts:—

- (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, shall be guilty of the offence of sexual harassment.

(2) Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) of sub-section (1) shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.

(3) Any man who commits the offence specified in clause (iv) of sub-section (1) shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

The wording of Section 354A of IPC that defined "Sexual Harassment" and imposed penalty were exactly the same.

Section 354A: Sexual harassment and punishment for sexual harassment-

A man committing any of the following acts-

physical contact and advances involving unwelcome and explicit sexual overtures.

a demand or request for sexual favours; or

showing pornography against the will of a woman; or

making sexually coloured remarks, shall be guilty of the offence of sexual harassment.


Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) of sub-section (1) shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.

Any man who commits the offence specified in clause (iv) of sub-section (1) shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

Clause 69 covers Sexual Harassment in the guise of a promise of marriage or employment.

Sec. 69. Sexual intercourse by employing deceitful means, etc.

Whoever, by deceitful means or making by promise to marry to a woman without any intention of fulfilling the same, and has sexual intercourse with her, such sexual intercourse not amounting to the offence of rape, shall

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be punished with imprisonment of either description for a term which may extend to ten years and shall also be liable to fine.

Explanation.— “deceitful means” shall include the false promise of employment or promotion, inducement or marrying after suppressing identity.

This change in law does impact the Quid Pro Quo scenarios that we saw at workplaces. Under the new provisions, if someone engages in intercourse or lures another person for sexual favors under the pretense of employment, this act is now criminalized and equated with rape. In instances where a complaint of this nature is brought before the Internal Committee (IC) under PoSH, the committee can proceed with their inquiry but must encourage the complainant to file an FIR with the police for the criminal justice process to take effect.

IV. ROLES AND RESPONSIBILITIES

Committees Reporting Structure

All IC's shall in all aspects report to the Apex Disciplinary Committee (ADC)


Responsibilities of the Committee

A. Apex Disciplinary Committee

- Formulate policy, procedure, systems, and communication guidelines
- Set regulations on quorum, documentation & reporting (Local & Statutory), accessibility & storage of documentation & ensure confidentiality.
- Disseminate procedural & functional knowledge among IC in areas of investigation & report writing
- Recommend actions to the BU management, based on the findings & recommendations of IC
- Create & maintain a uniform system of the central repository of investigation reports & documents
- Ensure enterprise-wide consistency in investigations and timeliness of all mandated actions.
- Compile & submit annual statutory reports to the district office, in the manner prescribed
- Ensure compliance with regulatory norms by keeping track of any amendments to the policy and updating it periodically
- Ensure reporting compliance as required under the Act
- Submit reports to the employer on an annual basis summarising cases and action taken

B. Internal Committee

- Ensure prompt and immediate reporting of cases to the Chairperson / Convenor of ADC
- Investigate and report all jurisdictional complaints in a time-bound manner within the guidelines of the policy

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- Ensure that the investigation report is filled out in the prescribed format
- Organize periodic local workshops and sessions to sensitize employees on the policy
- Ensure BU & geography specific location publicity of the policy through relevant materials, posters and emails.
- Enforce the strictest confidentiality for all proceedings

V. RECORD KEEPING

Attendance records of each of the session conducted for the IC members or by the IC members need to be captured.

VI. TRAINING

1. IC members to undergo training once in a year.
2. IC members to conduct awareness session, floor walks, people managers session once in a quarter.
3. All the employees shall be trained on the requirement of this policy once in a year.

VII. REVIEW AND AMENDMENT

1. The Policy will be reviewed every 3 years.