



POLICY FRAMED UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

1. Purpose:

At Sunrest Lifescience Limited (CIN: U74999GJ2017PLC099606) (Hereinafter referred to as "Sunrest"), 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
- 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.

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

2. Scope:

Sunrest is an equal employment opportunity Company and is committed to providing

Sunrest Lifescience Limited

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a work environment free of harassment, discrimination, and retaliation based on protected characteristics.

This Policy extends to all employees of Sunrest including Regional, Branch and Project Offices in India and is deemed to be incorporated in the service conditions of all employees.

Where sexual harassment occurs to Sunrest employee(s) as a result of an act by a third party or outsider while on official duty, Sunrest will take all necessary and reasonable steps to assist the affected female member in terms of support and preventive action. The Policy is not in derogation of any other legal rights of the affected employee(s).

3. Definitions:

- a. **"Complainant / Aggrieved Person"** means an employee who has been a victim of the act of sexual harassment and it also includes any external person such as Customers, Visitors, Suppliers, contractor etc. in the "Premises" of the Company.
- b. **"Employee"** means a female member 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
- c. **"Respondent/ Accused"** means a person against whom a complaint has been made by the aggrieved person member.
- d. **"Sexual harassment"** includes any one or more of the following unwelcome acts or behavior (whether implied or direct) namely:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favors; or



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- iii. Making sexually colored remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Prevention of Sexual Harassment:

Sunrest believes that no woman employee shall be subjected to sexual harassment at work and further prohibits any of the following circumstances to occur with relation or connection to any act or behavior of sexual harassment:

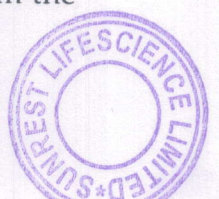
- i. Implied or explicit promise of preferential treatment in her employment; or
- ii. Implied or explicit threat or detrimental treatment in her employment; or
- iii. Implied or explicit threat about her present or future employment status; or
- iv. Interference with her work or creating an intimidating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

Workplace" means each of Sunrest's Corporate Offices, Project Offices, establishments in India (irrespective of the number of female employees engaged) and it shall mean to include any place where the employee works or visits during the course of employment and such place being under the control of the Company, including Hotel, Guest House, etc. where the employee is required to stay during the course of employment and transportation provided by the employer for undertaking journey.

4. Complaint Process:

- a. In accordance with the Act, Sunrest has formed an Internal Committee (IC).
- b. Any aggrieved person may make, in writing, a complaint of sexual harassment at work to the Internal Committee within a period of three (3) months from the

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date of the incident. In the case of a series of incidents, a complaint may be made within a period of three (3) months from the date of the last incident.

- c. A written complaint is must to start the investigation.
- d. If the aggrieved person is unable to make the complaint in writing, the IC members may assist in making a written compliant on behalf of the aggrieved person.
- e. If the aggrieved person is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.
 - Legal heir, relative or friend
 - Co-worker

5. Conciliation

- a. Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. **This is only if requested by the aggrieved personmember.**
- b. In case a settlement is arrived at, the Internal Committee records and reports the same to the Employer for taking appropriate action.
- c. The Committee provides copies of the settlement to Complainant & Respondent. Once the action is implemented, no further inquiry is conducted.
- d. No monetary settlement shall be made as a basis of conciliation
- e. The Inquiry process will be completed by the IC within ninety (90) days from the date of receipt of the complaint and the final enquiry report will be prepared by IC.

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6. Relief to Complainant:

While an inquiry is pending or in progress, the aggrieved person may be extended a relief in consultation by the IC members to provide temporary transfer, grant leave or any such benefit which is deemed fit for the circumstance. The Committee shall include the relief as part of their recommendation report.

7. Manner of inquiry into complaint

- a. Upon receipt of the complaint, the committee sends **one (1)** copy of the complaint to respondent within **seven (7)** working days.
- b. Upon receipt of copy of complaint, the respondent replies with all supporting documents within **ten (10)** working days of receiving the copy of the complaint.
- c. No legal practitioner can represent any party at any stage of the inquiry procedure.
- d. The Complaints Committee makes inquiry into the complaint in accordance with the principles of natural justice.
- e. In conducting the inquiry, a minimum of three committee members including the Presiding Officer is present.
- f. The Committee may terminate the inquiry or give ex-parte decision, if the complainant or respondent respectively is absent for **three (3)** consecutive hearings, without reason. **Fifteen (15)** days' written notice to be given to the party in advance, before termination or ex-parte order.

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8. Disciplinary Action against the Respondent

In the final report, IC on concluding the allegations have been proved, may recommend on the basis of the gravity of the misconduct committed any or more of the following penalties.

- a. a written apology from the respondent or issuance of reprimand/ censure by the management.
- b. a letter of warning
- c. immediate transfer or suspension without pay;
- d. withholding of pay rise or increments(s);
- e. demotion in a post
- f. counseling session for the Respondent;
- g. community service
- h. termination from services; and
- i. any other remedy provided by law.

9. Action for False or Malicious Complaint or False Evidence:

Where the Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person member or any other person making the complaint has produced any forged or misleading document, it may recommend to the Employer to take strict action against the female member or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of complaints substantiated as above.

While deciding malicious intent, the Committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

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9. Confidentiality of Proceedings and Information:

It is prohibited for any information related to the contents of the complaint, identity of complainant or witnesses, information relating to conciliation and inquiry proceedings, recommendations of the Committee or actions to be taken under the provisions of the Act to be publicized or made known to the public, press or media in any manner. Confidentiality of the proceedings, discussions and collection of witnesses will be maintained at all times.

10. Appeal Process:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within ninety (90) days of the recommendations being communicated.

11. Disclaimer:

This is a controlled document and any exception or deviation to this policy shall require approval of Managing Director Group COO and HR Head.

Note: To be displayed at a conspicuous place at the workplace

For, SUNREST LIFESCIENCE LIMITED

Bhagyesh Kiritbhai Parekh

Mr. BHAGYESH KIRITBHAI PAREKH
DIRECTOR

DIN: 07613171

