

# Prevention of Sexual Harassment (POSH) Policy

*Enriching Lives & Empowering Livelihoods*

Lupin Human Welfare & Research Foundation  
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## Table of Contents

<b>1. Policy Statement</b> .....	4
<b>2. Objective</b> .....	4
<b>3. Definition</b> .....	4
<b>4. Scope</b> .....	5
<b>5. Prevention of Sexual Harassment</b> .....	6
<b>6. Constitution of Internal Committee</b> .....	6
<b>7. Functions of Internal Committee</b> .....	7
<b>8. Meetings of Internal Committee</b> .....	7
<b>9. Reporting of Complaints</b> .....	8
<b>10. Conciliation and Inquiry Procedure</b> .....	9
<b>11. Inquiry Report and Recommendations</b> .....	10
<b>12. Disciplinary Action</b> .....	11
<b>13. Third Party Harassment</b> .....	11
<b>14. Confidentiality and Protection against Victimization</b> .....	12
<b>15. Role of Employer</b> .....	12
<b>16. Communication, Awareness, and Training</b> .....	12
<b>17. Other Remedies</b> .....	13
<b>18. Statutory Compliance</b> .....	13

## 1. Policy Statement

1.1. It is in acknowledgement of and in consonance with Lupin Values and Good Corporate Governance that Lupin ensures a professional and non-discriminatory work environment. Every individual can work together in an atmosphere free of all forms of harassment, exploitation, or intimidation.

1.2. The Policy provides a safe working environment and prohibits any form of sexual harassment against any employee, irrespective of their named gender. More specifically, it also addresses the requirement of prevention, prohibition and redressal of sexual harassment of women at the workplace as per mandates of 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, herein after referred to as "the Act". In Lupin, however, the policy goes beyond the legal ambit of the POSH Act and covers all genders.

## 2. Objective

2.1. To uphold the commitment of Lupin to provide an environment free of discrimination and indecent behaviour against employees at the workplace. In accordance with this Lupin follows a zero-tolerance approach to sexual harassment

2.2. To actively promote a social, physical, and psychological environment that will raise awareness about and deter acts of sexual harassment against employees at workplace

2.3. To ensure the implementation of the policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.

2.4. To evolve a mechanism and forum for the prevention and redressal of sexual harassment.

## 3. Definition

3.1. **Aggrieved Employee** – Means an Employee who has experienced or has been subjected to any act of Sexual Harassment by another Employee or a third party.

3.2. **Complaint** – A complaint of Sexual Harassment lodged with the Internal Committee.

3.3. **Complainant** – An aggrieved employee who lodges a Complaint with the Internal Committee.

3.4. **Employee(s)** – Means a person(s) employed at 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.

**3.5. Internal Committee** – The Committee constituted by Company in accordance with the provisions of the Act for redressal of a Complaint which is the same as ICC as amended by the act.

**3.6. Respondent** – A person against whom a Complaint is made by an Aggrieved Employee

**3.7. Sexual Harassment** - Sexual Harassment would mean any one or more of the following unwelcome behaviours (whether directly or by implication) namely:

**3.8. Workplace** - The organization or establishment including commercial, professional, industrial, financial, production, supply, sales, distribution or service as well as any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey

**3.9. “Their”** – Common Gender Pronoun – Throughout this policy, “their” “they” or “them” is used as a common, universal gender pronoun, irrespective of their named/preferred pronoun.

- a) Physical Contact & advances; or
- b) A demand or request for sexual Favors; or
- c) Making sexually coloured remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Definitions as per Act will override the above in case there is any discrepancy. While the Policy follows the Act for Protection of women in workplace, similar procedure would be followed for sexual harassment for any other gender

## 4. Scope

**4.1.** This Policy shall apply to all employees on payroll of the company and all persons employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor or supplier, with or without, the knowledge of the principal employer, whether for remuneration or not, or working for a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, the management, retainers, consultants, probationers, apprentice and trainees of the Company), present and future (collectively referred to as “Employee” or “Employees” for the purposes of this Policy).

**4.2.** This Policy shall apply to all entities under Lupin including all its Subsidiaries, Divisions and Sister Companies based out of India.

**4.3.** This Policy shall apply to all allegations of sexual harassment, whether within or outside the premises of the Company and/ or during an Employee’s employment and shall come into force with immediate effect. The Policy shall also apply in respect of all sexual harassment made by a third party against an employee, or vice versa if the sexual

harassment is alleged to have taken place within the Company's premises and/ or during the course of such Employee's employment.

## **5. Prevention of Sexual Harassment**

**5.1.** No employee shall be subjected to sexual harassment at any workplace.

**5.2.** The following circumstances, if it occurs or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment: a) Implied or explicit promise of preferential treatment in their employment; or

b) Implied or explicit threat of detrimental treatment in their employment; or

c) Implied or explicit threat about their present or future employment status; or

d) Interference with their work or creating an intimidating or offensive or hostile work environment for them; or

e) Humiliating treatment to affect their health or safety.

## **6. Constitution of Internal Committee**

**6.1.** The Company constituted an Internal Committee, which will receive, investigate, and recommend actions to Employer on all complaints of sexual harassment.

**6.2.** The Internal Committee shall be presided by a woman employed at a senior level at the workplace from amongst the employees.

**6.3.** Not less than two members from amongst the employees who are committed to the cause of gender diversity issues or who have had experience of social work or have legal knowledge.

**6.4.** One Female member from Non-Governmental Organization or Association committed to the cause of women or a person is familiar with the issues relating to the gender diversity issues/ sexual harassment against any gender is appointed on the committee.

**6.5.** The Internal Committee will be supported by local IC members representing the manufacturing locations and LRP.

**6.6.** At least one-half of the total Members nominated shall be women.

**6.7.** The names of the members of the Internal Committee along with their contact details are prominently displayed, from time to time, on the notice boards(s) of the Company at each of its offices/premises across the country. The Company shall also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Internal Committee, or the contact details of the members of the Internal Committee.

**6.8.** An Employee Member shall cease to hold office as a member of the Internal Committee if he/ she ceases to be an employee of the Company. Further, member shall be disqualified from acting as member if he/she is found guilty of committing an act of Sexual Harassment or any other act of moral turpitude. This policy shall continue to apply

to such Employee Members of the Internal Committee in their capacity as employees of the Company. In the event of any disqualification, resignation, or termination of appointment (by the Company) of any member, the Company shall, with respect to an outgoing Employee Member, forthwith notify a substitute Employee Member and shall, with respect to the Independent Member, make best efforts to find a substitute member as quickly as possible.

**6.9.** The term of the Internal Committee shall be 3 (Three) years from the date of its appointment. Provided however the Company may temporarily extend the term of the Internal Committee to dispose of any pending complaint. Members can be re-appointed on the committee for next term.

**6.10.** Notwithstanding the aforesaid, the Company shall be entitled, at its discretion and at any time and without any notice to discontinue the appointment (as member of the Internal Committee) of any member and appoint a substitute thereof.

## **7. Functions of Internal Committee**

**7.1.** The Internal Committee shall conduct inquiries into complaints /grievances of Sexual harassment in accordance 'the Act' and/or this Policy and recommend the action(s) to Company.

**7.2.** It shall keep a record of all complaints of sexual harassment received and the actions taken by the Committee and the Company thereon.

**7.3.** The Internal Committee shall, at the end of each calendar year, prepare an Annual Report of all the complaints of sexual harassment received and the actions taken by the Company thereon and shall submit the same to concerned government department (with a copy to the management of the Company)

**7.4.** The internal committee along with Employer shall take steps to spread awareness amongst the Employees about the Sexual harassment of employees at workplace, the policy of the company in this regard and issues of gender diversity.

## **8. Meetings of Internal Committee**

**8.1.** The members of the Internal Committee shall ordinarily meet at least once in every 3 months at the place and time as notified by the Chairperson. In the event of the Chairperson being absent in any meeting, the members shall appoint another member to be the substitute Chairperson for that meeting.

**8.2.** The Chairperson of the Internal Committee shall convene special meetings of the committee on receipt of complaint of Sexual Harassment. The meeting shall be convened as expediently and at a reasonable possible time.

**8.3.** The quorum for any valid meeting of the Internal Committee shall be at least three members including the external member and with not less than half the members present at such meeting being women. In the event of the number of members present / Women members present at any meeting is less than aforesaid, the Internal Committee

shall not discuss any matters or take any actions/ decisions save and except for electing the substitute Chairperson in case the Chairperson is absent and such meeting shall be adjourned to the following day or such other day as the Chairperson/ substitute Chairperson shall specify.

**8.4.** In the event that the aforesaid number of members present is still less than as stated above at any meeting, adjourned from a previous day, the Chairperson shall notify the Company (the Human Resource Department) of the absence of such members and the Company shall take steps to forthwith appoint a substitute member in place of the absentee members and the meeting of the Internal Committee shall be held on the next day.

**8.5.** The Decisions and recommendation of the Internal Committee shall be decided by the majority vote and in cases of division of votes equally, the Chairperson shall have a casting vote.

## **9. Reporting of Complaints**

**9.1.** An aggrieved employee may make, in writing, a complaint of Sexual Harassment at workplace to the Internal Committee, within a period of 3 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 complaint may also be addressed by email especially provided for reporting cases of sexual harassment at email address: [icc@lupin.com](mailto:icc@lupin.com).

**9.2.** The E mail can also be sent to Ms. Rajalakshmi Azariah, Chairperson of the Internal Committee, whose telephone number and mail address is given in IC members' details in Annexure A to this policy. In case complainant is not able to send the complaint by email, complaint can be sent by post or courier etc. at following address:

**Ms. Rajalakshmi Azariah**

**Presiding Officer Internal Committee**

Kalpataru Inspire, Highway, off Western Express Highway, Shanti Nagar, Vakola, Santacruz, East, Mumbai, Maharashtra 400055

**9.3.** Where such a complaint cannot be made in writing, the Presiding Officer or the Member of the Internal Committee shall render all reasonable assistance to the employee for making the complaint in writing.

**9.4.** Provided further that the Internal Committee for the reasons to be recorded in writing, extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such which prevented the employee from filing the complaint.

**9.5.** Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, their legal heir or such other person as may be prescribed may make a complaint under this section.

## **10. Conciliation and Inquiry Procedure**

**10.1.** The Internal Committee (IC) before initiating the Inquiry and at the request of aggrieved employees may take steps to settle the matter between the aggrieved and the respondent through conciliation.

**10.2.** No monetary settlement shall be made as a basis of conciliation.

**10.3.** When a settlement has been arrived at, the Internal Committee shall record the settlement that arrived and forward the same to the employer to take action(s) as specified in the recommendation.

**10.4.** The Internal Committee shall provide the copies of the settlement to the aggrieved employee and the respondent.

**10.5.** Where the settlement has arrived, no further Inquiry shall be conducted by the Internal Committee.

**10.6.** If there is no conciliation possible, the Complainant or the person lodging a Complaint on behalf of the Complainant shall file, with the Internal Committee, 6 written copies of the Complaint along with the supporting documents and names and addresses of witnesses, if any.

**10.7.** A copy of the complaint as recorded by the Internal Committee shall be given to the respondent as well as the complainant within 7 (seven) working days of recording of the same. The Respondent shall be required to submit their response to the complaint as well as to indicate whether the Respondent wishes to examine any witnesses or furnish any evidence. The Complainant shall also be required to indicate in writing whether the Complainant wishes to examine any witnesses or furnish any additional evidence to the Internal Committee. The responses of the Complainant and the Respondent as aforesaid shall be submitted to the Internal Committee in writing within 10 (ten) working days after the date of issue of the complaint by the Internal Committee.

**10.8.** Upon receipt of the responses from the Respondent and the Complainant, the Internal Committee shall conduct a hearing where both the Complainant and the Respondent shall be heard in person 4 (four) working days after the date of issue of the communication. In the event the Complainant and/or the Respondent fail to respond, the Internal Committee shall nevertheless proceed with the hearing after notifying both the Respondent and Complainant (as well as the witnesses, if any identified) of the time and venue of the hearing. The Complainant and the Respondent shall also have the right to lead evidence and to cross-examine witnesses.

**10.9.** In the event the Respondent is not present in person at a hearing of the Internal Committee; the hearing shall be adjourned to a date not later than 3 (three) working days from the date of the original hearing. The hearing shall be conducted on such adjourned date irrespective of whether the Respondent is present or not, provided that proper reasons have been submitted by the Respondent for not being present on that day. Provided further that nothing contained herein shall preclude the internal Committee

from adjourning such hearing for a longer period subject to recording its reasons for such adjournment.

**10.10.** The Internal Committee shall follow principles of natural justice in all its proceedings and subject thereto, shall maintain confidentiality of the identity of the Complainant, and the witnesses, as also the contents of the Complaint.

**10.11.** For the purpose of making an inquiry into the complaint the IC shall have powers of the civil court as under:

**10.12.** During the pendency of an inquiry on a written request made by the aggrieved woman, the Internal Committee, or the local Committee, as the case may be, may recommend to the employer to—

- a. Transfer the aggrieved woman or the respondent to any other workplace; or
- b. Grant leave to the aggrieved woman up to a period of three months; or
- c. Grant such other relief to the aggrieved woman may be prescribed.

**10.13.** The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

**10.14.** On the recommendation of the Internal Committee or the Local Committee, as the case may be, under sub-section (1), the employer shall implement the recommendations made under:

- a. Summoning and enforcing attendance of any person and examining him/her on oath.
- b. Requiring the discovery and production of documents; and
- c. Any other matter which may be prescribed.

In case of pendency of inquiry sub-section (1) and send the report of such implementation to the Internal Committee or the Local Committee, as the case may be.

## **11. Inquiry Report and Recommendations**

**11.1.** Within 3 (three) working days of completion of the Inquiry proceedings, the Internal Committee shall prepare its report (the “Report”), which Report shall include a summary of the proceedings and the evidence adduced by the parties. All members of the Internal Committee shall sign the said Report.

**11.2.** The Internal Committee shall, within 2 (two) days of completion of report, forward copies of the same to the Complainant and the Respondent for their comments and further explanations, if any. Such comments or further explanations shall be submitted to the Internal Committee not later than 3 working (three) days from the date of their receipt of the Report.

**11.3.** The Internal Committee shall, after on the expiry of the 3 (three) working day period, meet to review and evaluate the said Report along with the further explanations/ comments of the Respondent and/ or the Complainant, if furnished by them, to ascertain

as to whether an offence of Sexual Harassment as complained of, or any other violation of this Policy, has occurred.

**11.4.** In the event the Internal Committee concludes from the Report and further explanations (if any) that an offence of Sexual Harassment, or any other violation of this Policy, has been committed or has occurred, or that the complaint made by the Complainant is false and is based on malefice (for reasons/ rationale to be recorded in writing in each instance thereon) it shall further deliberate on and recommend in writing the disciplinary action(s) to be taken against the Respondent or Complainant (as the case may be).

**11.5.** The said report shall further set out the Internal Committee's recommendations on the disciplinary action(s) to be taken against the Respondent or Complainant (as the case may be). All members of the IC shall sign the said report.

**11.6.** The Internal Committee shall submit its report to the Managing Director of the Company.

## **12. Disciplinary Action**

**12.1.** Where the Internal Committee arrives at a conclusion that the allegations against the Respondent have been proved, it shall recommend the action(s) as per service rules applicable to respondent.

**12.2.** The Company shall act upon the recommendation within 60 days of its receipt by it.

**12.3.** Where the Internal Committee arrives at a conclusion that the allegations against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document during the inquiry or any witness has given false evidence or produced any forged or misleading document, it may recommend to take actions in accordance with the provisions of the service rules as applicable to the said Employee or in accordance with the rules and regulations applicable to non-employee witness.

**12.4.** Mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

**12.5.** All actions and recommendations of the Internal Committee shall be in accordance to the provisions under this Policy in general and under the provisions of Sexual Harassment (Redressal, prevention and Prohibition) Act 2013 with prescribed rules, for women, in particular.

## **13. Third Party Harassment**

In case of any of Sexual Harassment committed by any third party (not being an Employee) the Internal Committee shall actively assist and provide all its resources to the Complainant in pursuing the complaint and ensuring his/ her safety in the Company

premises during the course of his/her work for the Company on all working days and in case of any special work being conducted on holidays.

## **14. Confidentiality and Protection against Victimization**

The Company shall ensure that the Employees who complain to the Internal Committee or participate in the investigation of the Internal Committee as a witness or otherwise shall not be subject to any unfavourable treatment whatsoever during the course of his/her employment subject to clause.

## **15. Role of Employer**

**15.1.** The Company shall in consultation with the Internal Committee periodically review the provisions of this Policy and its implementation, taking into account the practical problems, if any, faced by the Internal Committee and/or the Company in the implementation of this Policy.

**15.2.** It shall be the duty of the management and the heads of each location, factory, department or office of the Company to read and acquaint themselves with the issues of sexual harassment and to endeavour to prevent or avoid situations or circumstances, which would be likely to create a hostile or offensive environment.

**15.3.** To arrange for training of an internal committee in terms of skill and capacity.

**15.4.** Company and IC will take following preventive measures to ensure that Sexual Harassment does not occur:

- a. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- b. Display at any conspicuous place in the workplace, the penal consequences of sexual harassment, and the order constituting the IC.
- c. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and gender sensitization as a whole.
- d. Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- e. Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- f. Display details of both informal and formal ways available to all Employees address/complain about workplace sexual harassment.

## **16. Communication, Awareness, and Training**

**16.1.** All Employees shall be communicated about this policy and gender sensitization at the time of their induction programme while joining the company.

**16.2.** Awareness and sensitization programs shall be undertaken at all factories and establishments of the company periodically.

**16.3.** It is mandatory for all employees to go through the POSH Awareness Training program released online on Lupin's learning management system (LMS) every year.

**16.4.** All IC members undergo mandatory POSH IC Training Program/Workshop every year.

**16.5.** Displaying of details of both informal and formal ways available to all employees to address/complain about workplace sexual harassment.

## **17. Other Remedies**

This policy is not intended to impair or limit the right of anyone to seek a remedy available under law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a complainant against an alleged perpetrator under any law in force.

## **18. Statutory Compliance**

Internal Committee need to submit an annual report on sexual harassment to the Committee of Ombudsperson. Company shall send the Annual report to the Competent Authority of Govt. under the above Act. Disclosure regarding the implementation of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act shall be included the Directors' Report in the Annual report of the Company under rules of Companies Act, 2013.