

Policy for Prevention and Prosecution of Acts of Sexual Harassment at the Workplace

A. Policy Statement

I. Objectives

1. NOVARTIS INDIA LIMITED (referred to as the **“Company”** in this policy document), in keeping with its values and behavior is committed to providing all its employees a safe and conducive work environment. The Company has zero tolerance for harassment, intimidation or humiliation of a sexual or gender-based nature in its workplace and is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute acts of sexual harassment.
2. The Company believes that all individuals have the right to be treated with dignity. Sexual harassment including discrimination or intimidation of a sexual or gender-based nature by or towards any employee in the workplace will not be condoned. The Company will not tolerate retaliation in any form against personnel for raising sexual harassment complaints or concerns.
3. This Policy applies to all allegations of sexual harassment made by any employee of the Company against another employee irrespective of whether sexual harassment is alleged to have taken place within the Company premises or in any other place visited by such employee for work. All actions prohibited for an employee of the Company by this Policy are also prohibited for all individuals who are on the Company premises or on any other property where the Company conducts its business. If an individual commits an act in violation of this Policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he or she had actual knowledge of such conduct and the authority to do so.

II. Definitions and Examples of Sexual Harassment

Sexual harassment is defined under this Policy as any conduct that is unwelcome and sexual in nature, whether direct or indirect, including physical contact and advances, a demand or request for sexual favors, making sexually colored remarks, circulating obscene content by email, sms or mms, showing pornography, or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. When any such act or acts are committed in circumstances where such conduct is humiliating and is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this Policy.

Sexual harassment may occur as a single incident or a series of incidents and may include, but will not be limited to the following which may interfere with an individual's performance by contributing to the creation of an intimidating, hostile or offensive environment:

- (a) Implied or explicit promise of preferential treatment in employment, or
- (b) Implied or explicit threat of detrimental treatment in employment, or
- (c) Implied or explicit threat of detrimental treatment about present or future employment status.

Sexual harassment may be of two kinds: (1) indirect, also referred to as a *“hostile work*

environment” and (2) direct, also referred to as a “*quid pro quo*”.

- (a) The indirect form of sexual harassment is one or more instances of unwelcome conduct that, taken individually or together, have the purpose or effect of (i) creating an intimidating, hostile, or offensive work environment, and (ii) unreasonably interfering with another’s work performance. Examples of this type of sexual harassment include pornography in public places, foul language or joking of a sexual nature. This form of sexual harassment does not need to be directed at any employee in particular.
- (b) Sexual harassment by one in a position of power or influence constitutes direct, or *quid pro quo*, sexual harassment when (i) submission by an individual is made either an explicit or implicit term or condition of employment, or (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee such as promotions, demotions, salary raises, hiring or termination.

Obligations of the Company

The Company does not tolerate sexual harassment of any kind and will take action against any employee for any conduct that violates this Policy.

2. The Company shall be responsible, among others, for the following:

- (a) Prohibit, prevent and deter commission of acts of sexual harassment;
 - (b) Implement the Policy by prohibiting gender-based discrimination and providing a safe & harassment-free work environment;
 - (c) Spread awareness of the Policy amongst its employees by publication, notification and circulation of the Policy;
 - (d) Sensitizing employees about sexual harassment issues;
 - (e) Provide fair and impartial procedures for resolution, investigation or prosecution of acts of sexual harassment by taking all necessary steps, including those more particularly provided hereinafter;
 - (f) Constitution of the Internal Committee (as hereinafter defined); and
 - (g) Implement the recommendations of the Internal Committee.
3. The Company shall make applicable filings to the appropriate Government authority with respect to the compliance with the Policy.
4. Upon becoming aware of the commission of an act of sexual harassment at work place, the Company shall have the right to initiate *suo moto* action even in the absence of a formal complaint being filed by any aggrieved employee.

B. Internal Committee

An Internal Committee will be set up by the Company, which will deal with all cases of alleged sexual harassment whether escalated to it by any Company employee, or taken up *suo moto* by the Company, to prevent and deal with sexual harassment and to otherwise implement the Policy.

I. Constitution of the Internal Committee

1. **Composition**: The Internal Committee shall consist of

- (a) a Chairperson who is a senior woman employee;
- (b) not less than (2) members from amongst the employees preferably committed to the cause of women or having experience in social work, HR matters or legal knowledge; and
- (c) one (1) member from outside the Company (an NGO representative or outside counsel familiar or dealing with cases of sexual harassment at workplace);

Subject always to at least half the members of the Internal Committee being women and the Internal Committee being headed by a woman member to be appointed by the Internal Committee from amongst its members. A minimum quorum of 3 members is required for the inquiry into complainants.

The Chairperson and every Member of the Internal Committee shall, unless they are re-appointed, automatically cease to hold office after expiry of a period of three (3) years, from the date of their nomination. The Chairperson or the any member(s) (except the external member) shall cease to hold office as a member of the Internal Committee if he/she ceases to be an employee on account of resignation, termination, or death or for any other reason whatsoever, and in such case the vacancy shall be filled by the Company.

It is further clarified that in case of a conflict of interest amongst the Internal Committee members and the parties, the Company shall ensure that the Internal Committee composition is changed for that particular matter to ensure a fair and neutral quorum.

The present composition of the Internal Committee is provided in **Annexure A**.

2. **Disqualifications:** A person shall be disqualified for being appointed, elected, nominated or designated, or for continuing, as a member of the Internal Committee, for any period of time during which there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.
3. **Confidentiality:** To the fullest extent practicable and consistent with the Internal Committee's need to investigate and ensure that corrective action is taken, all complaints of sexual harassment by employees will be processed with strict confidentiality.
4. **Filing a Complaint:** Any aggrieved employee may approach the Internal Committee with a complaint of sexual harassment under this Policy. The following steps will be followed in this regard:
 - (a) A complaint of sexual harassment is to be filed within a time limit of three (3) months. This may be extended to another three (3) months if the Complainant can prove that grave circumstances prevented them from doing the same within the stipulated time of three months.
 - (b) An employee making a complaint ("**Complainant**") has to give the complaint to the Internal Committee in writing along with supporting documents, names and addresses of witnesses and the said complaint will be afforded confidentiality as described in Section B.I.3.
 - (c) No person against whom a complaint is made shall be part of the Internal Committee.

- (d) Within seven (7) working days of the receipt of the complaint, the Internal Committee has to send a copy of the complaint to the alleged accused ("**Counter Party**") who will have ten (10) working days to file reply along with list of documents, names and addresses of witnesses.
- (e) At the first meeting of the Internal Committee, the Complainant shall be heard and the Internal Committee may, before initiating an enquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Counter Party through conciliation; provided there can be no monetary settlement as the basis of conciliation.
- (f) In case there is no request for conciliation or conciliation attempt fails, the Internal Committee shall proceed with the complaint and, if not already informed, approach the Counter Party to inform him of the allegation in order to start the investigation.

5. Proceedings of the Internal Committee:

The Internal Committee is intended to be an independent, objective and unbiased fact-finding body established to investigate any complaints of sexual harassment in a fair, reasonable and time-bound manner in a neutral environment. The meetings of the Internal Committee shall be conducted as per the guidelines and procedures issued by the Company from time to time. The Internal Committee shall conduct the enquiry in accordance with principles of natural justice. In addition to any guidelines issued by the Company, the Internal Committee will broadly be governed by the following principles in conducting its proceedings:

- (a) The Internal Committee shall give every reasonable opportunity to the Complainant and the Counter Party for putting forward and defending their respective cases and to ensure that the Complainant and the Counter Party have full opportunity to present their claims, witnesses and evidence, which may establish or substantiate their claims.
- (b) Both the Complainant and the Counter Party shall have the right to submit supporting evidence and shall have the right to bring their respective witnesses, if any, to be examined by the Internal Committee.
- (c) If the Complainant or the Counter Party fails, without sufficient cause, to be present before the Internal Committee for three (3) consecutive hearings, the Internal Committee will give a notice of fifteen (15) days to the concerned party before terminating the enquiry proceedings or giving an ex-parte decision on the complaint.
- (d) If considered appropriate by the Internal Committee, all meetings of the Internal Committee including with the Complainant, the Counter Party or any witnesses shall be held outside the relevant office and at a neutral venue to ensure comfort of parties.
- (e) The Complainant, the Counter Party or any other person that the Internal Committee meets with, interacts with, or has a teleconference or video conference with, for the purpose of enquiry into any complaint of sexual harassment shall be bound by strict confidentiality as described in Section B.I.3 above and each such party shall not be permitted to discuss the Internal Committee proceedings with any third person.
- (f) All the proceedings of the Internal Committee will be summarized by the Committee. In the event either the Complainant or the Counter Party is desirous of submitting a statement in writing or reviewing the summary of discussion prepared by the Internal Committee, such

statement shall be endorsed by such Party in token of authenticity thereof and submitted to the Committee.

(g) The Committee is required to complete the inquiry within a period of ninety (90) days from the date on which the Complainant files the Complaint.

(h) The Internal Committee shall complete the enquiry and make a report of its findings on the Complaint and its recommendations to the senior management of the Company ("**Management**") within a period of ten (10) days from the conclusion of the enquiry procedure set out above. The report of the Internal Committee shall also include recommendations for the imposition of any penalty and the reasons for such recommendations to the Management.

(i) Management shall take action within 30 days of receiving the report.

6. **Reporting by the Complaints Committee:** The Internal Committee shall prepare an annual report and file with the appropriate authority. The annual report shall contain the following details:-

- (a) Number of complaints received in the year
- (b) Number of complaints disposed of during the year
- (c) Number of cases pending for more than ninety (90) days
- (d) Number of workshops or awareness programs conducted
- (e) Nature of action taken by the employer.

7. **Disclosure Regarding Implementation of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act in the Directors Report**

The Company will insert the following statement in the Directors Report, as required under the Companies Act 2013 and any statutory modifications thereto:

"The Company has complied with the provisions relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013".

II. Implementation of Recommendations of the Internal Committee

The Management shall consider the recommendations and findings of the Internal Committee and take a decision in relation to action to be taken as soon as possible and within thirty (30) days of the submission of the report by the Internal Committee. The Management may issue such order or directions as it deems fit and shall inform the Complainant and the Counter Party of its decision. The Management of the Company shall provide all necessary assistance to the Internal Committee for ensuring full, effective and speedy implementation of this procedure for investigating any complaint of sexual harassment at work place in accordance with the Policy.

III. Punishment for Sexual Harassment

1. **Penalties:** If an employee is found to have violated this Policy, the Management shall take such action, as may be appropriate action for misconduct by the employee under the Company policy. Such actions may include any of the following, or a combination of the below mentioned statutory actions.

- (a) Written apology;
- (b) Warning;
- (c) Reprimand or censure;
- (d) Withholding of promotion;
- (e) Withholding of pay rise or increments;
- (f) Termination of employment;
- (g) Counselling session; or
- (h) Carrying out community service.

In addition to the above, such violation could also lead to prosecution under the under the Indian Penal Code or any other law for the time being in force.

2. **Compensation:** the Committee can also recommend monetary compensation in favour of the Complainant by way of deduction from the salary or wages of the Counter Party, in an amount that it may consider appropriate to be paid to the Complainant and in accordance with applicable law.

IV. Protection against Victimization

- (a) In the event the Counter Party is the Complainant's supervisor/superior, the Company shall, during the pendency of the Complaint, ensure that the reporting relationship is suspended and that the Complainant is not subject to appraisal by the Counter Party.
- (b) The Company shall strictly prohibit any sort of retaliation against the Complainant or any witnesses. Any act of reprisal, including internal interference, coercion and restraint, by the Counter Party, whether directly or indirectly, will result in appropriate action against the Counter Party by the Management in consultation with the Internal Committee.
- (c) Where the Counter Party is an outsider, during the pendency of the investigation of the Complaint and even thereafter, if found guilty, the Counter Party shall not be allowed to enter the Company premises except for the purpose of attending the Internal Committee proceedings.
- (d) In the event of the Counter Party and the Complainant both being employees of the Company, and the Counter Party is found to be guilty, irrespective of the penalty imposed, the Company shall ensure that the Counter Party shall not write the appraisal reports of the Complainant, if he is otherwise so authorized.
- (e) In the event, the Internal Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false, frivolous or made with malafide intention by the Complainant including due to personal issues with the Counter Party, then the Internal Committee shall make such appropriate recommendations to the Management to take action against the Complainant, as may be necessary. Such actions may include those referred to in Paragraph III (1) above.

V. Modification and Review of the Policy

The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this Policy or the composition of the Internal Committee to the extent

deemed necessary by the Company from time to time. Any such changes or modifications may be notified by the Company to its employees in due course.

Version No.	1.3
Modification Date	April 01, 2025
Key Changes	Change in List of Members under Annexure A

Annexure A**Internal Committee: Novartis India Limited****Committee Members**

Sr No.	Members of the Committee	Designation	E-mail ID
1	Shilpa Joshi	Presiding officer	shilpa.joshi@novartis.com
2	Sindhu Kotian	External Member	sindhu.kotian@gmail.com
3	Janhavi Shah	Member	Janhavi.shah@novartis.com
4	Madhu Gangadharan	Member	madhu.gangadharan@novartis.com
5	Chandni Maru	Member	chandni.maru@novartis.com
6	Abhijit Subhash Shetye	member	abhijit_subhash.shetye@novartis.com

Email address for sending complaints: icc.mumbai@novartis.com

Registered Office	Contact Person
Inspire BKC, 7 th Floor, 'G' Block, Bandra Kurla Complex, Bandra East, Mumbai 400 051	Shilpa Joshi, Chairperson, IC

Unless otherwise revised, the constituted Committee of the Registered Office shall be applicable for any other administrative unit/ office/ any other workplace of the Company.

Postal address for sending complaints: Registered Office as above.

Reviewed by	Responsibility	Date	Signature
Sanjeev Shrivastav	Country General Counsel		

Reviewed & approved by	Responsibility	Date	Signature
Avinash Kamath	Head, People & Organization and ERC		