

POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH)

Contents

1. Purpose	3
2. Scope	3
3. Definitions	3
4. Constitution of Internal Committee (IC).....	5
5. Responsibilities of the Internal Committee.....	5
6. Complaint Procedure	7
7. Redressal Mechanism	7
8. Interim Relief.....	8
9. Timeline For Investigation	9
10. Disciplinary Actions	9
11. Malafide Intentions	9
12. Appeals And Escalations.....	10
13. Preventive Measures.....	10
14. Retaliation	11
15. Complaint Against Third Party.....	11
16. Confidentiality	11
17. Dissemination.....	11
18. ANNUAL REPORT	12
19. Review & Amendments.....	12
20. FAQ	12
21. Contact	13
22. Document History & Review	13

1. Purpose

Aster DM Quality Care Limited and its **subsidiaries in India (“Organisation”)** provides an inclusive, safe, equitable, and respectful work environment for all associate involved with its business, with a strong commitment to the safety, dignity, and protection of women at the workplace. Sexual harassment, discrimination, or retaliation of any kind will not be tolerated. This Policy aligns strictly with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (“**SH Act**”), and all applicable amendments, to prevent and remedy any instance of workplace sexual harassment effectively, particularly in relation to women associates and stakeholders.

2. Scope

This Policy is applicable to all individuals engaged by the Organisation, including those on-roll associates, interns, trainees, apprentices, part-time associates, fixed-term contract associates, locum, daily-wage workers, Contract workforce, Associate Nurses, medical interns, academic trainees, contract workers or vendors, professional consultants, customers and probationers (“**Associate**”).

This Policy is applicable not only on the Organisation’s premises, but also in instances where individuals covered by this Policy have occasion to interact on a work-related basis (e.g., in vehicles, third party premises, off site meetings and public venues). Any conduct occurring through digital communication platforms, emails, messaging applications, video conferencing, or other virtual workspaces shall be treated as workplace conduct under this Policy, to ensure the safety and dignity of women associates in all virtual and remote working environments. The Organisation will not tolerate any form of sexual harassment, if engaged in by its associates, clients, suppliers or any other business associates, if such conduct occurs on the Organisation’s premises or during the course of the associate's work for the Organisation.

This Policy applies to any allegation of sexual harassment made by a female associate or visitor if the conduct occurred on the Organisation’s premises, or during the course of the associate’s work for the Organisation.

3. Definitions

For the purpose of this Policy, unless the context otherwise requires:

3.1 “Aggrieved Person” means any female Associate of any age, whether employed or not, working for remuneration or not, engaged directly or indirectly, where the term of engagement may be explicit or implied, or a co-worker, particularly a woman associate or woman stakeholder covered under this Policy, who alleges to have been subjected to any act of sexual harassment at the workplace.

3.2 “Complaint” means the first or initial written information alleging an act of Sexual Harassment, made by the Aggrieved Person or by any person authorized under this Policy to make such complaint on behalf of the Aggrieved Person.

3.3 “Complainant” means the person who files or submits a Complaint under this Policy, including the Aggrieved Person or any authorized representative permitted to file a Complaint on their behalf.

3.4 “Employer” means any person responsible for the management, supervision, and control of the Workplace.

3.5A “Internal Committee” or “IC” means the Internal Complaints Committee constituted by the Organisation under this Policy for redressal of complaints of Sexual Harassment.

3.6 “Parties” means the Aggrieved Person, the Complainant, and the Respondent, as applicable under this Policy.

3.7 “Associate” means all individuals engaged by the Organisation, including associates (full-time or part-time), interns, trainees, apprentices, probationers, contract workers, consultants, retainers, vendors, and any other person associated with the Organisation.

3.8 “Policy” means this Prevention of Sexual Harassment (PoSH) Policy of the Organisation, as amended from time to time.

3.9 “Respondent” means any person against whom a Complaint of Sexual Harassment has been made under this Policy.

3.10 “Sexual Harassment” means any one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature (whether directly or by implication).

Sexual harassment at the workplace includes:

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

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

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or

- Implied or explicit threats about present or future employment status; or
- Interference with work or creating intimidating or offensive or hostile working environment; or
- Humiliating treatment is likely to affect health or safety.

Some examples of acts or behavior of a sexual nature that may contribute to a hostile or offensive working environment include sexual inquiries, sexual talk, unwelcomed touching, display of sexual material(s), including but not limited to, electronic form, in the workplace, "invading space", obscene gestures, sexual jokes, etc.

3.11. **"SH Act"** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time, read together with the rules made thereunder.

3.12. **"Workplace"** means any location where Associate are engaged in work-related activity, including Organisation premises, off-site locations, travel, meetings, and remote or virtual work environments connected with the Organisation.

4. Constitution of Internal Committee (IC)

- 4.1 The Organisation has constituted IC for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints.
- 4.2 The names and contact details of the members of the IC, along with the designated IC email address, shall be prominently displayed at all units and locations of the Organisation.
- 4.3 Each IC shall be presided by a Presiding Officer (being senior women associate from the organisation) and shall comprise of a minimum of two other associates with legal expertise or experience in women's issues, and one external associate from an NGO/association. The Internal Committee shall consist of not less than four members, and at least one-half of the total members shall be women.
- 4.4 The term of the IC is for three years and members may be reappointed provided that the objectivity and credibility of the IC is not compromised.
- 4.5 An Internal Committee shall be constituted at each Unit/Establishment of the Organisation in accordance with the provisions of the SH Act.
- 4.6 The Corporate IC adjudicates escalations and appeals across units. IC associates are trained annually, and each IC undergoes periodic orientation and sensitization programs.

5. Responsibilities of the Internal Committee

- 5.1 The Internal Committee ("IC") shall discharge its functions in accordance with the provisions of the SH Act, this Policy, and the principles of natural justice. The IC shall conduct all proceedings fairly, impartially, and without bias towards any Party.

- 5.2 Upon receipt of a Complaint, the IC shall acknowledge receipt of the Complaint and, where appropriate, provide confirmation of the same to the Complainant within two (2) working days.
- 5.3 The IC may, for reasons to be recorded in writing and in accordance with applicable law, extend the time limit for filing a Complaint where it is satisfied that circumstances prevented the Aggrieved Person from filing the Complaint within the prescribed period.
- 5.4 The IC shall maintain appropriate records of all Complaints received and proceedings conducted under this Policy and shall ensure that all information relating to Complaints, inquiries, recommendations, and related records is maintained in strict confidence in accordance with this Policy and applicable law.
- 5.5 The IC shall ordinarily meet with the Complainant within five (5) working days of receipt of the Complaint or within such reasonable period as it may deem appropriate in the circumstances.
- 5.6 The IC shall provide a copy of the Complaint to the Respondent within seven (7) working days of receipt of the Complaint and provide the Respondent an opportunity to submit a written response.
- 5.7 The Respondent shall submit a written response to the Complaint, together with supporting documents and details of witnesses, if any, within ten (10) working days from the date of receipt of the Complaint or within such period as may be specified by the IC.
- 5.8 The IC shall provide the Complainant with a copy of the Respondent's written response and supporting submissions, subject to applicable confidentiality requirements, within seven (7) working days of receipt of the same.
- 5.9 Before initiating an inquiry, the IC may, at the written request of the Aggrieved Person, take steps to settle the matter through conciliation between the Parties. No monetary settlement shall form the basis of any conciliation.
- 5.10 Where a settlement is arrived at through conciliation, the IC shall record the terms of settlement and provide copies of the settlement record to the Parties and the Employer for implementation.
- 5.11 If the Aggrieved Person informs the IC that the terms of settlement have not been complied with, or where conciliation is unsuccessful, the IC shall proceed with an inquiry in accordance with this Policy and applicable law.
- 5.12 During the inquiry process, the IC shall provide both Parties with a reasonable opportunity to be heard, present evidence, submit documents, identify witnesses, and respond to the submissions made by the other Party.
- 5.13 The IC may call upon such witnesses and review such records, documents, or other materials as it considers necessary for a fair and complete inquiry.

5.14 Upon completion of the inquiry, the IC shall prepare a written report containing its findings and recommendations and submit the same to the Employer in accordance with the timelines prescribed under this Policy and applicable law.

5.15 The IC shall exercise only those powers and functions conferred upon it under the SH Act and this Policy and shall conduct all proceedings within the scope of its statutory authority.

6. Complaint Procedure

6.1 Any Aggrieved Person may file a complaint in writing (in the form of a letter or an email) within three months from the occurrence of the incident, or the last in a series of incidents. The IC may grant a further three-month extension for valid reasons and document the rationale for extension.

6.2 In certain special circumstances, where the victim is unable to make the complaint, the IC may allow an authorized person to make the complaint in accordance with applicable law.

6.3 The complaint must be in writing and can be in the form of a letter or an email. The complainant is required to disclose name and contact details of the person involved (where possible), and where the complainant is an associate, the department, division and the location where the associate is working, to enable the IC to contact the complainant and take the matter forward. The supporting documents and the names and address of witnesses should also be submitted along with the complaint.

6.4 Details required: factual summary of incident(s), dates, supporting documents, witnesses, and all known participants.

6.5 All interactions and reports must be treated with strict confidentiality.

7. Redressal Mechanism

7.1 IC will ensure a fair, neutral, and prompt inquiry, respecting rights of both complainant and respondent.

7.2 The IC will normally hold a meeting with the complainant, within seven (7) working days of the receipt of the complaint, or within such time period as it may deem reasonable. At this meeting, the IC shall hear the complainant and record his / her allegations.

7.3 The IC shall normally forward a copy of complaint to the respondent, within [seven (7) working days] of receipt of the complaint, or within such time period as it may deem reasonable and give them an opportunity to submit a written explanation if so desires.

7.4 The respondent shall file his / her reply to the complaint along with his / her list of documents and names and addresses of witnesses within a period of [ten (10) working days] from the date of receipt of the complaint from the IC or such other period that the IC may specify.

7.5 In the event a complaint is made against any member of the Internal Committee, such member shall recuse themselves from all proceedings relating to the complaint and shall not

participate in any discussion, inquiry, recommendation, or decision-making process concerning the matter.

- 7.6 All parties are entitled to impartial hearings, opportunity to present evidence, raise objections to IC findings, and receive copies of all relevant documentation. Conciliation may be offered at complainant's request (monetary settlements are barred). Where a settlement has been arrived at, the IC shall record the settlement so arrived at and forward the same to the Organisation to take action as specified in the recommendation.

Inquiry into the Complaint

Where the Aggrieved Person informs the IC that any term or condition of the settlement arrived at as part of the conciliatory proceedings has not been complied with by the respondent, or if the victim does not request for conciliation, or if the conciliation process fails, and where the respondent is an associate, the IC would proceed to make an inquiry into the complaint in accordance with the provisions of this Policy. As discussed above, where the respondent is a contract worker, the Organisation will work with the direct employer of the alleged offender to decide how the matter should be dealt with.

Quorum for the inquiry proceedings shall be three (3) members of the IC including the Presiding Officer.

Where the respondent is a patient, attendant, visitor, vendor, consultant, customer, or any person not employed by the Organisation, the Internal Committee shall conduct such inquiry as may be permissible under applicable law and recommend appropriate corrective, preventive, contractual, administrative, or legal action. The Organisation shall extend all reasonable assistance to the aggrieved person.

Both the respondent and the complainant (unless specifically exempted by the IC in writing) shall be required to attend every hearing. If either party fails to attend three (3) consecutive hearings without sufficient cause, the IC may terminate the inquiry or pass an ex-parte order with [fifteen (15) days'] notice. The inquiry shall, in all cases, be conducted in accordance with the principles of natural justice.

While conducting the inquiry, the IC shall call upon such witnesses as it may deem appropriate and provide a reasonable opportunity of being heard to both the victim and the complainant.

Upon completion of the inquiry, the Internal Committee shall submit a report containing its findings and recommendations to the Employer/Management within ten (10) days of completion of the inquiry.

8. Interim Relief

During the pendency of the inquiry, on a written request being made by the Aggrieved Person, the IC may recommend Organisation to: (a) transfer the Aggrieved Person to another office as deemed appropriate, or (b) transfer the respondent to another office as deemed appropriate, or (c) grant paid leave to the victim up to a period of three (3) months, or (d) restrain the respondent from reporting on the work performance of the Aggrieved Person or writing the Aggrieved Person's appraisal / confidential report(s). The IC may also recommend the Organisation to suspend the respondent [with

full pay] or grant paid leave to respondents during the pendency of the inquiry if the circumstances so merit.

9. Timeline For Investigation

IC must complete the investigation and submit its inquiry report within 90 days from the receipt of Complaint. In exceptional circumstances, including non-availability of parties, medical emergencies, law enforcement involvement, complex investigations, or other reasons recorded in writing, the timeline may be extended to the extent permitted by applicable law.

10. Disciplinary Actions

10.1 If the respondent is found guilty of sexual harassment, depending upon the gravity of the offence and without prejudice to any legal right(s), the IC may make any of the following recommendations of disciplinary action to be taken against the respondent:

- Direct the respondent to provide a written apology to the Aggrieved Person, clearly indicating that such behaviour will not be repeated and that no retaliatory steps will be taken by him / her or others on his / her behalf against the victim.
- Direct the respondent to undergo counselling/training to address any specific issues.
- Give a verbal or written warning/disciplinary note which will also be noted in the respondent's record.
- Transfer the respondent to a different role/location
- Direct suspension/termination of employment of the respondent.
- Direct deduction of a compensatory sum from the respondent's salary.
- Withholding of promotion, increments, or bonuses
- Any other recommendations as it may deem fit.

10.2 In the event the IC concludes that the respondent is not guilty, the Organisation shall not take any further action.

11. Malafide Intentions

11.1 Malicious or knowingly making false complaints or producing any forged or misleading document will attract disciplinary action under Organization's Code of Conduct, but complainants are protected unless intent is demonstrably malicious.

11.2 Mere inability to prove a complaint does not constitute malice. All acts must be documented and reviewed impartially.

11.3 The IC may also recommend to the Organisation to take appropriate disciplinary action if it arrives at a conclusion that any witness has given false evidence or produced any forged or

misleading document. These recommendations to be made by the IC will be similar to the recommendations of disciplinary action to be taken against the respondent if they are found guilty of sexual harassment, as discussed in clause 9.1 under section 'Disciplinary Actions' above.

12. Appeals And Escalations

12.1 Parties may appeal IC recommendations within 90 days of receipt of the same to the appellate authority as prescribed under applicable law

12.2 All appeals must result in a written decision communicated to all parties.

13. Preventive Measures

13.1 Safe Environment: Ensure physical, digital, and emotional safety for all associates.

13.2 Display of Rules: Penal consequences of sexual harassment and IC information displayed at conspicuous locations in all offices.

13.3 Awareness Programs: Regular workshops and sensitization sessions conducted for all Associate

13.4 Contract Workforce Training: Contractors must ensure associate are regularly educated on anti-harassment practices.

13.5 Organisation Policy: Treat sexual harassment as misconduct under the Organisation's Code of Conduct, HR Policies, and applicable disciplinary framework

13.6 IC Facilities: Provide IC with all required resources to process complaints.

13.7 Attendance & Information: Facilitate attendance of respondent and witnesses; provide information for smooth inquiry processing.

13.8 Legal Aid: Support complainants wishing to file complaints under applicable laws outside IC.

13.9 Initiate Action: Pursue legal action when the offense is covered under country/state laws and record this in inquiry reports.

13.10 Management Support: Management ensures speedy, complete, and fair Policy implementation.

13.11 Third Party Support: When harassment is caused by outsiders or third parties, Organisation commits to assisting victims with all necessary support and preventive action.

13.12 Police Escalation: IC must report and recommend police action where required by law.

14. Retaliation

- 14.1 Retaliation against complainants, witnesses, or associate cooperating with IC is strictly prohibited and may lead to disciplinary action.
- 14.2 Any instances of retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, must be immediately reported to the IC and the Organisation will then address the concerns raised.

15. Complaint Against Third Party

- 15.1 In cases involving a third-party (vendor, visitor, etc.), the IC coordinates with that entity's IC or management.
- 15.2 IC recommends appropriate corrective action, legal aid, and ensures comprehensive assistance to affected associate.

16. Confidentiality

- 16.1 Organisation understands that it is difficult for the victim / complainant to come forward with a complaint of sexual harassment and recognizes the victim / complainant's interest in keeping the matter confidential.
- 16.2 To protect the interests of the victim / complainant, the respondent, witnesses, and others who may assist with the inquiry into a complaint of sexual harassment, confidentiality must be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances. This does not mean that details of the complaint, defence, witness names and statements, etc. will not be shared with the other party or management on a need-to-know basis. The IC, the Organisation, the victim / complainant, the respondent, and the witnesses will all be bound to keep information relating to the inquiry process confidential.
- 16.3 The victim / complainant, respondent, witnesses, and members of the IC who are Associate of the Organisation who breach the confidentiality of the inquiry process would be liable for disciplinary action up to and including termination.

17. Dissemination

- 17.1 This Policy shall be provided to all associate during joining or transfer, with written acknowledgment of understanding and compliance.
- 17.2 Policy and IC details will be displayed prominently in all offices and facilities.
- 17.3 All Associate are encouraged to familiarize themselves with the Policy and direct queries to HR or IC representatives.

18. ANNUAL REPORT

18.1 Under the Provisions of the Act the annual report shall have the following details (any amendments to these provisions of the Act, would deem that the requirements given below also will change):

- i. Number of complaints of sexual harassment received in the year.
- ii. Number of complaints disposed during the year.
- iii. Number of cases pending for more than ninety days
- iv. Number of workshops or awareness program against sexual harassment carried out.
- v. Nature of action taken by the employer or District Officer.

18.2 The said annual report shall be submitted to the employer and The District Officer as well, as per the provisions of the Act. The report shall be submitted on a yearly basis.

19. Review & Amendments

19.1 Organisation reserves the right to review and revise this Policy annually as required at the discretion of management.

19.2 Any amendments shall be communicated to all members in a timely manner.

19.3 In the event of any conflict between this Policy and the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the provisions of the SH Act shall prevail.

20. FAQ

Q1: Who can raise a complaint?

Any associate, contract workforce, intern, vendor, visitor, or third party associated with Organisation.

Q2: Are complaints confidential?

Absolutely. All details remain strictly confidential and used only for inquiry purposes.

Q3: Do these protections cover remote workers or business travel?

Yes. The Policy applies to all work locations, including remote, virtual, travel, and offsite settings.

Q4: What support does Organisation provide to victims?

Procedure guidance, counselling, legal support, strict non-retaliation, and privacy / confidentiality at all stages.

Q5: May a complaint be submitted anonymously?

Indian law focuses on empowering the victim to report complaints of sexual harassment and to provide a reasonable opportunity to the respondent to present his defence. Accordingly, aggrieved persons should disclose their identity and not file complaints anonymously.

Q6: How are cases reported to authorities?

IC will provide all reasonable support to file a complaint with authorities in relation to any offence ensuring timely police reporting, as mandated by law.

Q7: How is Policy updates communicated?

All changes and updates are notified in writing to associate. Policy remains available at all times in physical and digital formats.

Q8: Who is responsible for preventive actions?

HR, IC, and all line managers, with oversight from senior management (members from Band 2 and above).

(Note: This Policy shall always be governed by “The Sexual Harassment at Workplace (Prevention, Prohibition & Redressal) Act, 2013” and its amendments. All statutory requirements and best practices are incorporated to ensure compliance, transparency, and associate well-being.)

21. Contact

For any queries related to this Policy, please contact the HR Department

Email Id: hrhelpdesk@asterqualitycare.com

Contact No.: Authorised person at your work location

22. Document History & Review

Version	Date	Reviewed by	Approved by	Reasons with Description