



ASTER DM HEALTHCARE
ANTI-SEXUAL HARASSMENT POLICY

Policy: HRD-ICO-003

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	Name	Designation	Effective Date
Authored by	Dr Anna George	Chairperson, ASH committee, Aster DM Healthcare India	03/06/2025
Reviewed by	Durga Prasanna	Convenor, ASH Committee, Aster DM Healthcare India	03/06/2025
Reviewed by	Hari Prasad VK	Head of IA, Risk and Compliance	03/06/2025
Reviewed by	Ramachandra MS	Finance Controller	03/06/2025
Approved by	PRC	Policy Review Committee	28/06/2025



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Revision No: 02

Table of Contents

1. Objective	3
2. Scope.....	3
3. Definitions	4
4. Duties of the Employer.....	6
5. Internal Complaints Committee (IC).....	6
6. Submission of a Complaint:.....	9
7. Redressal Process.....	10
8. Appeal	14
9. Annual Report	14
10. Confidentiality.....	14
11. Protection Against Retaliation.....	15
12. Responsibility of the Internal Committee (Unit and Corporate level).....	15
13. Preventive measures the company shall take	16
14. Amendments	17
15. Dissemination.....	17



ASTER DM HEALTHCARE
ANTI-SEXUAL HARASSMENT POLICY

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Revision No: 02

1. OBJECTIVE

- Aster DM Healthcare Limited (termed as “Aster” or “Company” in this document) is an equal employment opportunity company and is committed to creating a healthy working environment that enables all personnel to work without fear of prejudice, gender bias and sexual harassment. The company also believes that all personnel have the right to be treated with dignity. Sexual harassment at the workplace, extended workplace or other than workplace if involving personnel is a grave offence and is therefore punishable.
- This Policy is a document used to make awareness among the employees and other personnel of an organization about the POSH Act (The Sexual Harassment of Woman at Workplace), 2013 or any related Act's/Legal requirements. The purpose of this document also is to provide **a safe, secure and enabling environment, free from sexual harassment to every personnel**. The personnel may not be aware of what constitutes sexual harassment and the boundaries by which they need to act while dealing with other personnel of the company.

2. SCOPE

- The Law is applicable to women employees only but as a healthy governance practice and as part internal policies, the Company has extended the benefit of this policy to all personnel, irrespective of the gender. Thus, this policy shall be applicable to all complaints of sexual harassment made by any one against any person present within the premises the workplace of the Company or extended workplace in the context of work.
- This policy is applicable to all employees of the company working full time or part time, interns, probationers, trainees, apprentices, consultants, retainers, contract workforce, customers (including bystanders), and vendors (termed as “personnel” in this document) working from companies’ geographical offices, working from home or virtual office, travel outside their assigned work location on business assignment and conferences appearing in official capacity or any person within the premises of the work space of “Aster DM Healthcare Limited.”
- The company has the right to take appropriate action against personnel covered under this policy if a complaint in respect of sexual harassment is filed by an outsider or 3rd party who has visited the workplace.
- The complainant can be of any gender natural or self-identified. The company has the right to initiate inquiry under this policy on receiving the complaint, IC (Internal Committee) can take any precautionary action if the issue is noticed by the members without a formal complaint. Upon receipt of information, IC shall assist the complainant in converting the verbal information into a written complaint and take consent from the complainant by obtaining signatures on such a complaint.
- All instances of sexual harassment, by whatever means of communications, that may arise out of company’s offices, branch offices, premises where the business of the company is carried on or any place visited by the personnel, arising out of or not during the employment, including company provided transportation, company sponsored travel or trainings or conferences will be considered as a potential complaint as a sexual harassment



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ANTI-SEXUAL HARASSMENT POLICY

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Next Review Date: 30/06/2027

Revision No: 02

outside the company premises.

- Repeated proposals of establishing a romantic or sexual relation by or with personnel, despite the refusal of the person being approached, whether the two personnel are of the same sex, or the opposite sex, would be considered as sexual harassment by the personnel making the proposals.
- In instances where the complainant decides not to approach the IC for an inquiry, however, when he wants to file a police complaint, IC shall attempt to reach out to the Complainant and confirm on the way forward. If the complainant wants to continue with police complaint and not an IC inquiry, that shall be documented adequately by the IC and the issue shall be considered as closed

3. DEFINITIONS

- “Aggrieved Person” shall mean, a person of any age, whether employed or not, working for remuneration or not, engaged directly or indirectly, term of employment may be explicit or implied, or a co-worker, who alleges to have been subjected to any act of sexual harassment at workplace.
- “Ethics Committee” shall mean the Committee formed under the Ethics Committee Charter.
- “Complaint” shall mean the first or initial information alleging the act of harassment which is sexual in nature made by the aggrieved person/ the relative of the aggrieved/ or anyone who has noticed the instance of harassment and reported on behalf of the aggrieved. All complaints shall be obtained in writing.
- “Complainant” shall mean the party who initiates the complaint or provides any information of an incident alleging the act of sexual harassment by personnel or other
- “Personnel” shall mean all employees of the company working full time or part time, interns, probationers, trainees, apprentices, consultants, retainers, contract workforce, customers (including bystanders), and vendors.
- “Employer” shall mean any person responsible for the management, supervision, and control of the Workplace.
- “Internal Committee” shall mean the Internal Complaints Committee (IC) set up under this Policy.
- “PoSH Act” shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as may be amended from time to time read together with the rules made there under.
- “Policy” shall mean “The Anti-Sexual Harassment Policy”
- “Parties” shall mean aggrieved, complainant, and the respondent.
- “Respondent” shall mean any person against whom a complainant / aggrieved person has made a written complaint of Sexual Harassment as set forth herein.
- “Sexual Harassment” shall include any one or more of the following unwelcome acts of behavior, however not limited to:



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Revision No: 02

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
- Physical contact and advances.
- Demand or request for sexual favors.
- Making sexual colored remarks including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography or the likes.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas.
- Verbal or non-verbal communication which offends the individual sensibilities and affects individual performance and has sexual connotation/ overtone/ nature.
- Teasing, innuendos and taunts, physical confinement and /or touching against one's will and likely to intrude upon one's privacy.

Further, the following circumstances (among others) may amount to sexual harassment if it occurs or is present in relation to any other act of Sexual Harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment is likely to affect health or safety of the working environment.
- An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy
- "Workplace" shall mean all office premises of the Company (including registered office, corporate office, branch office, retail premises, units, co-working space, parking space), transportation provided by the Company, any place visited by the personnel in connection with work duties, work conferences, offsites, business trips, (domestic or foreign), formal and informal team events (whether physical or virtual events), home office (in case of a remote working arrangement includes virtual offices), Social media platforms, electronic media and communication during or outside the office. **The above instances are only illustrative and by no means constitute an exhaustive definition of the workplace.**



ASTER DM HEALTHCARE
ANTI-SEXUAL HARASSMENT POLICY

Policy: HRD-ICO-003	
Issue Date: 15/09/2023	
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Next Review Date: 30/06/2027	
Revision No: 02	

4. DUTIES OF THE EMPLOYER

- The Employer shall make available the 'Code of Conduct', as well as Sexual Harassment policy, which shall be uploaded on the website of the company
- The Employer shall constitute an Internal Committee (IC) once every 3 years. The members of the IC shall hold their post not beyond 3 years. If the members are to be re-appointed, that shall be via nomination and documentation shall be retained for the same
- Every IC Member shall be appointed by way of issuance of an appointment letter specific to the IC obligations.
- The Employer shall display the PoSH policy at conspicuous places in the workplace along with the consequences of sexual harassment.
- The Employer shall conspicuously display the composition of the IC along with the contact details (email etc.) where the aggrieved can send their complaints.
- The Employer shall hold regular workshops and awareness programs for sensitizing all personnel (as applicable) about Sexual Harassment at Work and The PoSH Policy at place.
- The Employer shall ensure that the IC is also regularly trained (at least once a year) and sensitized to appropriately handle the grievances sent to it. In this regard, the employer shall hold regular orientation and capacity building programs to educate and upskill the IC members.
- The Employer shall provide necessary facilities to the IC for dealing with complaints and conducting inquiry. The employer shall make available all such information from its records to the IC which may be required for the purpose of conducting the inquiry.
- The Employer shall consider the recommendation of the IC within 60 days of receipt of the report of the IC. Further the employer shall aid the aggrieved in case the personnel choose to file an FIR in relation to the offence
- The Employer shall ensure timely submission of the annual report of the IC as per the requirement of the Act
- Employer shall maintain confidentiality of the inquiry and details of complainant, aggrieved and respondent

5. INTERNAL COMPLAINTS COMMITTEE (IC)

- Composition of the IC:
 - A Committee will be constituted by the Employer in every unit / business vertical to consider and redress complaints of Sexual Harassment. The Committee appointment will be based on the requirements as per the Act.
 - The IC within whose unit premises the incident had occurred, such IC shall be responsible as an 'appropriate IC' to follow all obligations under this policy.
 - In the event where the incident occurred outside the premises of the workplace, the IC committee upon



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ANTI-SEXUAL HARASSMENT POLICY

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Next Review Date: 30/06/2027

Revision No: 02

receiving such information shall be considered as an 'appropriate IC' to follow all obligations under this policy.

- The IC shall consist of the following members to be nominated by the employer, namely:
 - (a) a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees
 - (b) not less than three members from amongst employees preferably having experience in social work or having legal knowledge
 - (c) one member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. It is preferable to have this person with legal knowledge
 - (d) Provided that at least one-half of the total members so nominated shall be women.
 - (e) The Presiding Officer and every member of the IC shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the employer.
 - (f) The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the IC, by the employer, as may be prescribed.
 - (g) A quorum of a minimum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and external member as mandatory.
 - (h) Every IC shall ensure to be comprising of women up to 50% or more of the strength.
- In the Company, there will be an Internal Complaints Committee (IC) at the unit / business vertical level (termed as Local IC) and one at the India Corporate Office level (termed as Corporate IC)
- A member of the IC may resign at any time by tendering the resignation in writing to the Company. Any of the inquiries which is pending shall be closed before the member vacating the office
- **Jurisdiction of the IC:**
 - The IC has the jurisdiction to address the issues related to Sexual Harassment at workplace only.
 - If the complaint is made against the employer (for e.g. at unit level), the local IC shall refer the case to the IC at India Corporate level for inquiry
 - If the complaint is made against the employer (at a corporate level), the IC at India Corporate level shall conduct inquiry or take support of additional external representatives as appropriate to have an impartial inquiry
 - If the complaint is made against any of the IC members, then the mentioned member shall not be part of the inquiry
 - Where the aggrieved / complainant and respondent are from different units, such cases shall be referred to the Corporate IC to decide on which local IC shall carry out the inquiry



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ANTI-SEXUAL HARASSMENT POLICY

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Revision No: 02

- The IC shall assist the complainant / aggrieved to report the incident to the jurisdictional police station if the complainant / aggrieved wishes to do so.

• **Disqualification of the IC:**

The IC members shall be removed where they are found to:

- Have been guilty of sharing the confidential information related to the sexual harassment inquiry, conciliation, etc. to press or public.
- Have an inquiry pending under any law or have been convicted for an offence under any law for the time being in force
- Have any disciplinary proceeding pending against them or found guilty in any disciplinary proceedings
- Have so abused the position, to render their continuance in office, prejudicial to public interest
- Should any complaint arise against the presiding officer or any of the members of the IC, the presiding officer or the member shall be excluded from the proceedings and an alternate member shall be appointed in their position
- Have a bias against the complainant or aggrieved person
- Contravenes any provisions of this policy

• **Duties of the IC:**

The IC is expected to provide a sound mechanism for redressal of complaints by:

- Accepting and registering in due time, any complaint pertaining to sexual harassment at workplace.
- Carry out the inquiry in an impartial manner
- Conducting inquiries within the specified timelines and recommending to the employer, any action to be taken.
- Recommending to the employer the need for medical, psychological, and emotional assistance to the parties, if necessary.
- Seeking police or legal intervention wherever necessary; and
- Keeping the entire proceedings confidential.
- The IC shall submit an annual report to the employer and District Officer containing details of the complaints of sexual harassment received in the year (as per requirement of the Act)
- All members of the IC, before proceeding with any inquiry on complaint of sexual harassment at workplace shall ensure that they are free of any conflict of interest with the parties.

• **Term and Vacancy:**

- Each IC member shall hold office for a term of 3 (three) years from the date of appointment (provided they continue to remain employees of the Company during this period). These members can be re-



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Next Review Date: 30/06/2027

Revision No: 02

appointed, however based on nomination, and they continue to be in employment. Details of re-constitution shall be documented and maintained

- The Employer may temporarily extend the Term of any IC member to dispose of any pending complaints of sexual harassment.
- The Employer shall be entitled to remove IC members in the manner provided for under the Act.
- Once an IC member ceases to be an employee of the Company for any reason whatsoever, such member shall no longer remain a part of the IC.
- In case any vacancy arises in the IC, the same shall be filled within a reasonable time of arising of such vacancy.
- If any member of the IC is not available on a temporary basis, (e.g. maternity leave or sabbatical), then the IC shall decide whether a replacement is needed for the mentioned period.
- The total number of IC members including Presiding Officer and External committee member shall not be less than 5(Five) at any given time.

• **Request by Member:**

- Any IC member who is in the best of knowledge knows that objectivity may be compromised for any reason may apply to the IC to remove themselves from an inquiry. The IC will consider whether to accept such requests and if accepted, shall appoint a replacement Internal Committee member for an investigation in accordance with this Policy and notify all concerned parties

• **Powers of the IC:**

- The IC shall have the same powers as are vested by the Act. The Interim reliefs and recommendations by the IC may not be binding on the employer and the parties.
- The Employer shall consider the recommendations/findings to take further course of action in accordance with the policies of the company.

6. SUBMISSION OF A COMPLAINT:

- Any personnel who feel and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the IC Chairperson or IC members in writing within three months of occurrence of such incident and in case of a series of incidents, within 3 months from the date of the last incident. Personnel may submit their complaint to the unit level committee or corporate level committee as applicable, using the respective email ID meant for only raising complaints related to sexual harassment.
- For all personnel working in the Corporate Office, complaints shall be sent in writing to ASH.India@asterdmhealthcare.in within three months of occurrence of such incident and in case of a series of incidents, within 3 months from the date of the last incident. For unit level IC, common email ids are defined



ASTER DM HEALTHCARE
ANTI-SEXUAL HARASSMENT POLICY

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Revision No: 02

and displayed in the respective units. Email IDs of the IC members are also displayed in the units, which can be considered by the alleged personnel or complainant for raising a complaint

- This corporate email ID can also be used to report incidents by unit level employees in case they find it uncomfortable to report at the unit level or want to escalate in case further appeal is warranted.

The Members of the IC at Corporate level are as follows:

Chairperson	Dr. Anna George
Convenor	Mr. Durga Prasanna Nayak
Member	Dr. Anup R Warriar
Member	Ms. Geethanjali U
Member	Ms. Deepa Susan Thomas
Member	Ms. Sathyaja J P
External Representative	Ms. Nalini Nagaraja

7. REDRESSAL PROCESS

- Aggrieved personnel or a complainant who alleges to have been subject to any act of sexual harassment at the workplace shall make a written complaint to the IC at their respective location/ unit as applicable
- Provided that such a complaint cannot be made in writing, an appointed Presiding Officer or any other member shall render all reasonable assistance to the aggrieved/ complainant for making the complaint in writing.
- Where the personnel are unable to make a complaint on account of their physical incapacity (permanent or temporary), a complaint may be filed by:
 - A relative or friend,
 - Their colleague,
 - An officer of National Commission for Woman or State Commission for Woman,
 - Any person who has knowledge of the incident
- Where the personnel are unable to make a complaint on account of their mental incapacity (permanent or temporary), a complaint may be filed by:
 - A relative or friend.
 - A special educator (A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs)
 - A qualified psychiatrist or psychologist



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Revision No: 02

- The guardian or authority under whose care they are receiving treatment or care
- Any person who has knowledge of the incident jointly with the relative or friend or a special educator or a qualified psychiatrist or psychologist or guardian or authority under whose care the personnel is receiving treatment or care.
- Where the personnel are unable to make a complaint due to any other reasons, a complaint may be filed by any person who has knowledge of the incident
- Where the personnel are dead, a complaint may be filed by any person who has knowledge of the incident, with the consent of the legal heir of the personnel or by the legal heirs themselves.
- The complaint shall be made within 3 (three) months from the date of occurrence of the incident of sexual harassment (in case of a series of incidents, within a period of 3 (three) months from the date of the last incident). The IC may extend this time limit by an additional period of 3(three) months, if IC is satisfied that the delay in reporting the incident is due to reasonable cause
- All complaints should be clear and should include details of the incident(s), supporting documents (as applicable), names of individuals involved and the name and contact details of the witnesses (if any).
- IC shall take steps to ensure confidentiality of the entire inquiry
- The personnel shall submit to the IC the complaint along with supporting documents and names and addresses of the witness, if any. Digital or scanned documents may be submitted, if the documents are affixed with original / digital signatures.
- Where anonymous complaints are received, if the details of aggrieved and respondent details are clearly mentioned, the IC shall inquire with the aggrieved personnel and then accept the complaint, if the same is found to be true. If the details are not clear in the anonymous complaint, IC can decide not to take it further
- After receiving a written complaint, the IC shall, within 7(seven) working days, send a copy of the same to the Respondent
- The Respondent shall submit a written reply within 10 (ten) working days from the date of receipt of the notice.
- During the pendency of an inquiry, on a written request being made by the complainant or aggrieved, the IC may recommend that the Company:
 - Transfer the complainant / aggrieved / respondent to another office as deemed appropriate.
 - Grant leave to the aggrieved for up to 3 (three) months, which shall be in addition to the entitled leave as per Leave Policy
 - Dissolve the reporting relationship between the parties.
 - Any other measures as the IC deems fit
- While the Complaint is being ascertained, The IC shall inform the complainant / aggrieved about “conciliation”. The option of opting for conciliation is available to the complainant / aggrieved. Conciliation is nothing but a process of settling the issue amicably between the parties with IC as Conciliator.



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ANTI-SEXUAL HARASSMENT POLICY

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Revision No: 02

- The Respondent can either agree or refuse to reconcile.
- No monetary settlement shall be made as the basis of conciliation.
- After arriving at the settlement, the IC shall record the terms and conditions and obtain signatures of the parties on the settlement agreement and same shall be forwarded to the employer.
- The complainant / aggrieved and the respondent shall also receive copies of the settlement documentation.
- Where a settlement has been reached, further inquiry shall not be conducted.
- In cases where the parties fail to comply with the terms of settlement, the IC shall proceed to make an inquiry into the complaint in accordance with the provisions of this Policy and the PoSH Act.
- A fair, prompt and impartial inquiry shall be conducted by the IC and exam the merit of every complaint made.
- IC shall take a decision to probe further in accordance with the procedure specified in the PoSH Act.
- IC shall hold examinations separately to record statements of aggrieved, complainant, respondents and witnesses. This can be followed by a cross- examination as appropriate. During the inquiry, if any other personnel need to be discussed with, IC can discuss with them also as deemed fit for the purpose of inquiry
- If the complainant / aggrieved or the respondent wants to submit any evidence or require any witnesses to be called, they shall communicate the same to the IC.
- Any evidence submitted to the IC by the complainant / aggrieved, respondent or witness, shall be duly examined by the IC. Additional input, if any needed, can be requested by the IC
- The IC shall ensure that prior notice of a hearing is given to all concerned parties. If the parties are not able to attend due to any unavoidable reasons, those shall be duly informed in writing to the IC and a different date / slot shall be allotted by the IC for hearing
- If the complainant/ aggrieved /respondent fails to attend 3(three) consecutive hearings without sufficient cause, the IC shall terminate the inquiry or pass an ex-parte order respectively.
- Such an ex-parte recommendation shall not be passed without giving prior written notice of 15 (fifteen) days to the parties concerned.
- The IC shall ensure that the inquiry is, always, conducted in accordance with the principles of natural justice.
- The IC shall complete the Inquiry within 90(ninety) days from the date of receipt of the complaint. In case of any delay, the reasons for the delay shall be duly documented and these should be justifiable
- After completion of the inquiry the IC shall have an additional 10 (Ten) days to prepare the inquiry report.
- The copy of the Inquiry report shall be shared with the parties and reasonable time is given to parties to raise objections or concerns if any.
- The IC shall address the objections and concerns raised by the parties and then make its conclusion and recommendations.
- The Employer is bound to act on such a report within 60 (sixty) days of receipt from the IC



ASTER DM HEALTHCARE
ANTI-SEXUAL HARASSMENT POLICY

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Revision No: 02

- During the inquiry procedure, neither of the parties shall have a right to be represented by any legal practitioner
- If the Respondent is found to be guilty of sexual harassment, depending on the gravity of the offence and without prejudice to any legal right(s) that the complainant / aggrieved, the IC may make any of the following recommendations against the Respondent:
 - The Respondent should undergo training or counselling to address any specific issues
 - The Respondent should provide a written apology to the complainant/ aggrieved
 - The Respondent should be transferred to another position or different place.
 - The Respondent should be provided with a verbal or written warning which will also be reflected in the Respondent's personnel record.
 - Withholding of the Respondent's promotion, increment or bonus (whether in full or in part).
 - The services of the Respondent should be terminated/suspended.
 - Deductions from the salary of the Respondent to be paid to the complainant/ aggrieved as compensation
 - Any other recommendations such as the IC may deem fit.
- In the event the IC concludes that the respondent is not guilty, then it shall recommend to the employer that no further action needs to be taken.
- If the complainant / aggrieved intends to take criminal action against the Respondent, the IC and the Company shall support the same, and shall provide all reasonable assistance in this regard.
- Where the allegation made by the complainant / aggrieved against the respondent are found to be malicious or falsified, or that the complainant / aggrieved has produced any forged or misleading document, IC may recommend action to be taken against the complainant as it would have taken against the respondent for a genuine case of sexual harassment at workplace.
- Mere inability to substantiate a complaint or provide inadequate proof will not make a complaint malicious/ falsified.
- In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons and directed to the requisite forum to be resolved, e.g. Grievance Committee. It is the responsibility of the IC to forward such complaints to the relevant Committees for further actions.
- Regardless of the outcome of the complaint being made in good faith, the personnel lodging the complaint and any person providing information (as part of the inquiry) or any witness will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the IC shall ensure that the personnel are not victimized or discriminated against by the Respondent.
- Any unwarranted pressures, retaliation or any other type of unethical behavior from the respondent against the personnel while the investigation is in progress should be reported by the complainant / aggrieved to the



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IC as soon as possible. Disciplinary action will be taken by the IC against any such complaints which are found to be genuine.

8. APPEAL

- The party concerned has the right to appeal against the recommendations of the IC, within a period of 90 (ninety) days in accordance with the requirements of the Act and in line with this policy. Any differences between the policy and the Act, the details in the Act will prevail

9. ANNUAL REPORT

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

10. CONFIDENTIALITY

- It shall be the duty of the IC, or any person entrusted with the duty to handle or deal with the complaint of sexual harassment as well as every person having knowledge of the complaint of sexual harassment to ensure strict confidentiality with respect to the contents of the complaint of sexual harassment and inquiry proceedings.
- The contents of the complaint made, the identity and address of the aggrieved / complainant, respondent and witness, any information relating to conciliation and inquiry proceedings, recommendation of the IC and the action taken by the employer shall not be published, communicated or made known within the company, to the public, to the press and media in any manner.
- Only the justice secured to the complainant / aggrieved may be made known under the reports required to be furnished under the law, subject to written confirmation from the company.
- Failure in maintaining confidentiality shall attract penalties or disciplinary actions in line with the Aster's Code of Conduct or with the provisions of the Act.



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ANTI-SEXUAL HARASSMENT POLICY

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Issue Date: 15/09/2023

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Next Review Date: 30/06/2027

Revision No: 02

11. PROTECTION AGAINST RETALIATION

- The Company prohibits any form of retaliation against an individual who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of Sexual Harassment.
- Any individual who believes to be experiencing retaliation should report the same to the IC.
- Any person who is found to be guilty of retaliation would be subject to appropriate disciplinary action in line with the Aster's Code of Conduct or with the provisions of the Act.

12. RESPONSIBILITY OF THE INTERNAL COMMITTEE (UNIT AND CORPORATE LEVEL)

- The IC must follow principles of natural justice. It means that IC must conduct the thorough inquiry fairly, in a neutral manner and without any bias for or against anyone.
- The IC Chairperson shall confirm the complaint within seven days of receiving the complaint. If possible, an acknowledgement shall be provided to the complainant / aggrieved
- The IC may, for reasons recorded in writing, extend the time limit not exceeding three months (for filing the complaint), if it is satisfied that the circumstances were such which prevented the personnel from filing a complaint within said period.
- The IC will maintain a register to endorse the complaint received by it and keep the content confidential, if it is so desired, except to use the same for discreet investigation.
- The respondents shall file their reply to the complaint along with a list of documents and names and addresses of the witness, if any, within a period of ten (10) working days from the date of receipt of the notice.
- The Presiding Officer will share a copy of the Letter of explanation to the complainant /aggrieved within seven (7) working days upon receiving the Letter of explanation from the respondent.
- The IC shall hold a meeting with the complainant / aggrieved within five (5) working days of the receipt of the complaint
- The IC may, before initiating an enquiry and at the request of the personnel, take steps to settle the matter between the complainant / aggrieved and the person against whom the complaint is made ('Respondent'), provided that no monetary settlement shall be made as a basis of this conciliation.
- Further the IC shall provide copies of the settlement as recorded to the complainant / aggrieved and the Respondent. If the complainant / aggrieved informs the IC that Respondent has not complied with the settlement, IC shall proceed to conduct enquiry.
- At the first meeting, the IC members shall hear the complainant / aggrieved and record the allegations. The complainant / aggrieved can also submit any relevant material with documentary proof, oral or written material, etc., to substantiate the complaint. If the complainant / aggrieved does not wish to depose personally



ASTER DM HEALTHCARE

ANTI-SEXUAL HARASSMENT POLICY

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Revision date for this version: 03/06/2025,
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Next Review Date: 30/06/2027

Revision No: 02

due to embarrassment of narration of event, a lady officer for lady personnel and a male officer for male personnel shall meet and record the statement.

- Thereafter, the person against whom the complaint is made, the Respondent, may be called for a deposition before the IC and an opportunity will be given to give an explanation, where after, an “Inquiry” shall be conducted and concluded.
- IC holds power to inquire and give a report only within the stipulated statute/ Act
- Moral Policing’ is not the job of the management or of the IC. Any consensual relationship among adults would not be the concern of the management or of the IC, if the said relationship does not affect the working environment and the discipline of the organization and is not contrary to the Act / Rules or Aster’s Code of Conduct
- IC cannot make comments on the personal conduct of the parties and the IC’s jurisdiction would be restricted to the allegations of sexual harassment and whether a complaint is made out or not, to that effect.
- The IC Chair in every unit shall analyze and put up a report on all complaints of this nature for submission to the Corporate IC Chair by the 5th of every month the format as below:

S. N	Month & year	Case Summary	Date of complaint received	Date IC met	Date in which decisions shared with Parties	Respondent details	Complainant details	Case substantiated (Yes/No)	Findings of the IC	Action Taken	Case Closed (yes/no)	Escalated to local police (yes/no)

- The Corporate IC Chair shall consolidate the details of complaints, status, training provided, other initiatives etc., of the company and present the same to the Ethics Committee (at least once a quarter).

13. PREVENTIVE MEASURES THE COMPANY SHALL TAKE

- Provide a safe working environment for all personnel.
- Display in writing at a conspicuous place, the penal consequence of the sexual harassment and information about the IC
- Organize workshops and awareness programs at regular intervals for sensitizing the personnel with the provisions of the law
- Ensure that adequate training is provided for the contract workforce by the contractors
- Provide the necessary facilities with the IC to deal with the complaints for conducting the enquiry.



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Revision No: 02

- Assist in securing attendance of the Respondent and witnesses before the IC; make available such information to the committee for the smooth processing of the complaint.
- Aid is as applicable to the personnel if they choose to file a complaint in relation to the offence under the applicable law of the country/state or any other relevant law.
- Cause to initiate action, under the applicable law of the country/state or any other relevant law if any.
- Treat sexual harassment as misconduct under the service rules / HR Policy and initiate / recommend action for such misconduct.
- The management shall provide all necessary assistance for the purpose of ensuring full, effective, and speedy implementation of this policy.
- Where sexual harassment occurs because of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In case the Committee finds the degree of offense coverable under the applicable law of the country/state or any other relevant law, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

14. AMENDMENTS

- The Company reserves the right to amend this Policy as and when required to ensure compliance with PoSH Act, rules and other governing laws.

15. DISSEMINATION

- The Policy shall be mandatorily provided to every personnel (as applicable) at the time of joining and HR shall obtain acknowledgement in writing of having understood the policy and will comply with the same
- The details of the IC shall be displayed prominently in the Company's office premises.

Note: This policy will be overall governed by the statute "The Sexual Harassment of at the Workplace (Prevention and Redressal) Act, 2013" and its' subsequent amendments.



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Annexure:

Unit	IC Email IDs
Aster Narayanadri	ash.narayanadri@asterhospital.in
Aster Prime	icc.asterprime@asterhospital.in
India Corp	ash.india@asterdmhealthcare.in
Aadhar	icc.asteraadhar@asterhospital.in
Aster Mandya	internalcomplaintscommittee.astergmh@asterhospital.in
CMI, CMI Clinics and CMI Nursing College	internalcomplaintscommittee.astercmi@asterhospital.in
RV	antisexualharassment.asterrv@asterhospital.in
Whitefield	antisexualharassment.whitefield@asterhospital.in
Areekode	icc.amh@asterhospital.in
Calicut	icc.mimsc@asterhospital.in
Kannur and Homecare	icc.mimsknr@asterhospital.in
Kottakkal	icc.astermimsk@asterhospital.in
Medcity and Aster Capital	icc.astermedcity@asterhospital.in
PMF	icc.asterpmf@asterhospital.in
ADH	antisexualharassment.adh@asterdmhealthcare.in
AHA	ash@asterhealthacademy.com
Aster Labs	posh.labs@asterlabs.in
ATH & AMI	antisexualharassment.adh@asterdmhealthcare.in
CMI Nursing College	internalcomplaintscommittee.astercmi@asterhospital.in
Pharmacy	icc@asterpharmacy.in