

**SHREE AMMAN PHARMA INDIA (P) LTD.**

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EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION POLICY**1. STATEMENT OF COMMITMENT**

1.1. The Shree Amman Pharma India Private Limited (SAPIPL) is committed to promoting a workplace that provides equal employment opportunities and is free from all forms of discrimination. SAPIPL recognizes that workplace discrimination is a serious violation of the rights and freedoms of employees and potential employees at a workplace. Discrimination at the workplace serves to further marginalise those who may already be facing discrimination in other spheres of life, owing to caste, class, religion, sexuality, gender identity and disability, amongst others, and can have severe detrimental effects on their mental, physical, and social well-being.

1.2. The fundamental rights enshrined in the Constitution recognise the principle of equality and non-discrimination. Article 14 of the Constitution vests in all persons the right to equality before the law, and Articles 15-18 provide important anti-discrimination measures in different spheres of public life. In particular, Article 15 prohibits discrimination against any citizen on the grounds of religion, race, caste, sex, place of birth or a combination of them. Article 16 prohibits discrimination in the realm of public employment. Both Articles 15 and 16, also recognise the principle of positive discrimination or affirmative action, stating that the adoption of special measures for women, children, Scheduled Castes, Scheduled Tribes and Other Backward Classes would not be a violation of the principle of equality, and would serve to remedy the structural inequalities existing in the Indian society.

1.3. SAPIPL believes that the adoption of the Shree Amman Pharma India Private Limited Anti-Discrimination and Equal Opportunity Policy is an important step towards the creation of an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its staff, and where each individual feels that all decisions are taken free of discrimination, giving them an equal opportunity based on their relevant abilities and skills. The due process provided under the Policy will be followed by the EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION Committee, and every effort shall be made to avoid any backlash or retaliatory action against persons making complaints under the Policy.

2. FOSTERING AN INCLUSIVE WORKPLACE

2.1. SAPIPL will strive to create a safe and non-discriminatory work environment. It will act decisively against all forms of discrimination and implement this Policy in its true letter and spirit.

2.2. SAPIPL acknowledges that the principle of neutrality, for example, being gender neutral or caste neutral, would serve to deepen existing marginalisation and would not advance the principle of equality in the workplace. Instead, it is guided by the principle of substantive equality and recognises that women, Dalit and Adivasi communities, Muslims, LGBTQIA+ persons, amongst others, are more vulnerable to workplace discrimination than others. It resolves to be conscious of the structural and individual vulnerabilities faced by persons in the formulation and implementation of this Policy.

2.3. SAPIPL will seek to ensure that its workforce is diverse and representative, at all levels of its functioning, including senior management. It will pro-actively recruit from marginalised communities, including from Dalit, and Adivasi communities, Muslims, LGBTQIA+ persons, and persons with disabilities, including persons with psychosocial disabilities, and mental illness, amongst others.

2.4. SAPIPL will keep all its employment, human resource, travel, leave and other policies under periodic review, to take proactive measures to identify and eliminate structural barriers to workplace diversity. In doing so, it may have its policy reviewed by an external expert and will also consult its staff members and ensure an open channel of feedback.

2.5. SAPIPL will organise periodic training for sensitising employees and consultants on issues relating to workplace discrimination. It will empanel experts on issues of gender, caste, religion, physical and mental health, disability, and the law, and ensure that training on these issues is held periodically. Separate trainings will be held for members of the Committee constituted under Clause 7 of the Policy.

2.6. SAPIPL will actively encourage all of its grantee organisations to adopt an anti-discrimination policy. Such policy of the grantee organisation may be adapted to reflect the size and capacity of the organisation.

2.7. SAPIPL will ensure the public display of the key aspects of this Policy in both English and the local language in its office, including the contact details of the members of the Committee constituted under Clause 7 of the Policy. Each existing employee and consultant will be provided with a copy of the Policy upon its initial adoption, and new employees and consultants will be provided with a copy of the Policy upon joining.

3. PROTECTED CHARACTERISTICS

SAPIPL will treat the following attributes as protected characteristics for the prohibition of unfair treatment and ensuring equal employment opportunities:

- Age,
- Maternity,
- Caste,
- Marital or Civil Partnership Status,

- Colour,
- Descent,
- Disability,
- Economic Status,
- Family Background,
- Gender Identity,
- Health Status,
- HIV Status,
- Language,
- Medical Record,
- Mental Health,
- Physical Features,
- Place of Birth,
- Race,
- Religion,
- And Sexual Orientation,
- Genetic or Other Predisposition Toward Illness,
- or A Combination of Them

4. ENSURING EQUAL EMPLOYMENT OPPORTUNITIES

4.1. SAPIPL will not deny to any employee, consultant, or potential employee or consultant, equal employment opportunities on the basis of a protected characteristic, or a combination of them. The denial of equal employment opportunity occurs when a person is not recruited, appointed, promoted, provided professional opportunities, or is terminated on the basis of one or more of the protected characteristics, which has the effect of imposing a disadvantage not imposed on others or which withholds or limits access to advantages available to others.

4.2. It is clarified that any distinction, exclusion, eligibility condition, or preference in respect of particular recruitment, appointment, promotion, or provision of training opportunities, will not be a denial of equal employment opportunities if it is directly linked to the requirements of work to be undertaken.

4.3. If SAPIPL believes that its workforce is not adequately diverse or certain marginalised communities are underrepresented, it may actively seek to ensure such communities are adequately represented. Such action will not be considered a denial of equal employment opportunities.

4.4. When carrying out any recruitment, appointment, promotion, or provision of training opportunities, SAPIPL may ask an individual to disclose personal information regarding their identity and protected characteristics to take measures of positive discrimination or to consider steps for reasonable accommodation. It will be made clear to the individual that such disclosure is voluntary, and, if made, will be treated as confidential and only disclosed to those persons considering the application.

5. ADDRESSING WORKPLACE DISCRIMINATION

5.1. Workplace discrimination occurs when a person is unfairly treated at the workplace on the basis of one or more of the protected characteristics, which may include any of the following acts, whether directly or by implication, namely:

- a. Coercion
- b. Communication or expression of negative stereotypes, or, abusive or offensive comments, including jokes, about a person's protected characteristics.
- c. Creation of a hostile work environment.
- d. Disruption of work.
- e. Harassment.
- f. Restriction regarding the access of common spaces or use of common resources.
- g. Any other unwelcome, physical, verbal, or non-verbal conduct, done in person, or through any other mode of communication.

5.2. Unfavourable treatment of a person on the ground of association of such person with another person with a protected characteristic will amount to workplace discrimination. Further, unfavourable treatment of a person on the perception, whether accurate or otherwise, of such person as having a protected characteristic will amount to workplace discrimination.

5.3. An act of discrimination may be committed intentionally or unintentionally.

5.4. For the purposes of this Policy, the workplace includes the following:

- a. The SAPIPL Office, currently at No. 9(5), 7th Street, Gopalapuram, Chennai 600 0086.
- b. Any place where employees or consultants are required to visit for work, such as meetings, workshops, trainings, and conferences;
- c. The virtual workplace, that is, where any of employees or staff are connected through the internet or telecom, regardless of the platform and without regard to geographic boundaries; and
- d. Transportation undertaken for any work-related purpose.

5.5. It is clarified that any differential treatment directly linked to the requirements of work to be undertaken will not constitute workplace discrimination.

6. REASONABLE ACCOMMODATION

6.1. A person with a protected characteristic, who is otherwise qualified to perform their job, may request reasonable accommodation in their working conditions to enable them to perform the essential functions of their work or enjoy equal benefits at the workplace. Reasonable accommodation entails adjustments to the working conditions, deadlines, forms of communication, providing flexibility in timings, amongst others.

6.2. Upon receiving such a request, SAPIPL will assess its ability to implement such reasonable accommodation. If it determines that such measures would cause it a significant administrative or financial hardship, it may decline to implement them.

6.3. All reasonable accommodation measures will be agreed to in writing with the person concerned and SAPIPL in advance.

7. EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION COMMITTEE

7.1. The EQUAL OPPORTUNITY AND ANTI-DISCRIMINATION Committee ('the Committee') as constituted under this Policy will have the jurisdiction to consider complaints of workplace discrimination and denial of equal employment opportunities.

7.2. The Committee will have the following members:

- a. A senior employee as the Chairperson (P NIRMALA)
- b. Two employees of SAPIPL (M GOWTHAMI & C N ANURADHA)
- c. One independent person as an external member, who has knowledge on issues of equality, anti-discrimination, social work or law (J LAKSHMI – PRACTICING ADVOCATE)

7.3. The external member will not have any regular financial, professional or social dealings with SAPIPL and its management, to ensure their independence.

7.4. In a scenario where a complaint is made against a senior employee/Chief Executive Officer/Executive Director, a special Committee will be constituted by the Board of Directors, comprising three independent and external members only.

7.5. The best effort will be made to ensure diversity of the members of the Committee, in terms of the protected characteristics mentioned above.

7.6. In a scenario where any member of the Committee is known to either of the parties before it, the said person will excuse themselves from the Committee for that particular case, in order to avoid a conflict of interest.

7.7. The Chairperson and Members of the Committee will hold their position for a period of 5 years from the date of their nomination.

8. COMPLAINT PROCEDURE

8.1. A complaint of a denial of equal employment opportunity or workplace discrimination may be made by:

- a. A current or former employee, whether employed on a regular, temporary, ad hoc, or daily wage basis, a current or former consultant, or any person that has worked or is working for remuneration or on a voluntary basis; and
- b. A third party that comes into contact with any person from SAPIPL during the course of their work.

The person making the complaint is referred to as the Complainant. The person against whom the complaint is made is referred to as the Respondent.

8.2. A complaint against workplace discrimination and/or denial of equal employment opportunities should be made in the following manner:

- a. The complainant may submit a written and signed complaint to any member of the Committee.
- b. If the complainant is unable to make the complaint themselves, on account of disability, mental illness or for any other reason, the Committee may depute a person to assist them in making the complaint and through the process of the Committee or permit the complainant to take the assistance of a person of their choice, such as their counsellor, to assist them in this regard.
- c. In the event of the death of the complainant, any person who has knowledge of the incident may submit the complaint, with the written consent of the complainant's legal heir, including family of origin, next of kin, and chosen family of the complainant.
- d. The Committee may act on anonymous complaints if they are of a nature, which may be inquired into without requiring the participation of the complainant. In particular, these may relate to structural issues, employment conditions or policies.

8.3. The Complaint should be submitted within six months from the incident, and in case of multiple incidents, within six months from the latest incident. In case of any exigent circumstances, the Committee may relax this requirement, and extend the time for filing a complaint.

8.4. The Committee will ensure that the identity of the Complainant and their witnesses are kept confidential.

8.5. Redressal Process:

- a. The Committee will send a written acknowledgement of the receipt of the complaint to the complainant.
- b. Within five working days of receiving the complaint, the Committee will inform the respondent in writing that a complaint has been received and provide them with a copy. The respondent will have an opportunity to respond to the complaint in writing within next five working days. SAPIPL will strive to create an environment where the employees will feel safe to complain, in case of discrimination.
- c. If the complainant consents, the Committee may initiate a conciliatory process between the complainant and the respondent. The complainant should not be pressurised directly or indirectly into entering conciliation. No monetary settlement will be made as a basis of conciliation. The Committee will then follow a non-adversarial process and seek to arrive at a

fair conclusion that is agreeable to both parties. The resulting agreement will then be communicated to the Managing Director and be acted upon, and no further inquiry will be made by the Committee into the matter.

- d. If conciliation is not possible or a settlement cannot be arrived at, the Committee will launch its redressal process. The complainant and the respondent will be called upon to submit all supporting documents and a list of witnesses.
- e. The evidence of the complaint and their witnesses will be recorded first, and thereafter that of the Respondent and their witnesses. The opposite party may submit a list of questions to the Committee, which the Committee will ask the witness. The Committee will ensure that questions are respectful, especially for the Complainant and their witnesses, where they feel safe and comfortable and are not humiliated or threatened.
- f. No advocates or lawyers for either party will be present during the proceedings of the inquiry.
- g. If either Complainant, without sufficient cause, fails to attend three consecutive hearings, the Committee may terminate the proceedings. If the Respondent fails to attend three consecutive hearings, it may proceed to arrive at a decision without the Respondent.
- h. The Committee will take into consideration the power dynamics between the complainant and the respondent, both within the organisation as well as professional circles, and ensure that the process it follows protects the complainant from any intimidation or coercion.

8.6. Interim Measures:

During the pendency of the inquiry, on request by the complainant, the Committee may recommend SAPIPL to:

- a. Grant the complainant leaves up to a maximum of three months, in addition to the leave they would otherwise be entitled to.
- b. Modify team structures such that the respondent is not evaluating the work or performance of the complainant.
- c. Take other measures to provide a conducive environment of safety and protection to the complainant against retaliation and victimisation as a consequence of making a complaint.
- d. In making its recommendation, the Committee will ensure that the interim measures do not have the direct or indirect effect of penalising the complainant for making the complaint.

8.7. Final Decision:

- a. Decisions taken by the Committee will be through a majority vote.
- b. Within 7 days of the conclusion of the inquiry, the Committee will submit its report containing the findings and recommendations to the Managing Director.

- c. Where the Committee concludes that the complaint against the respondent has not been proved, it will recommend to the Managing Director that no action is required to be taken on the complaint.
- d. Where the Committee concludes that the complaint against the respondent has been proved, it may recommend any of the following:
 - i. Counselling.
 - ii. Censure or reprimand.
 - iii. Apology to be tendered by the respondent.
 - iv. Withholding promotion and/or increments
 - v. Suspension for a fixed period without pay.
 - vi. Termination.
 - vii. If the respondent is a third-party vendor or consultant, the Committee may recommend that SAPIPL cease its engagement with such person, terminate its contractual relationship, or cease inviting the concerned person to events organised by SAPIPL.
- a. In making its recommendations, the Committee will be guided by the principle of proportionality, that is, it will consider what a just, appropriate and proportionate response would be to actions of the Respondent.
- b. The Managing Director will act upon the Committee's recommendations within 5 days and send a compliance report to the Committee.
- c. The Committee may also make suggestions with regard to certain policies of SAPIPL, which the Managing Director may consider implementing.

9. PROTECTION AGAINST VICTIMISATION AND RETALIATION

No person will be penalised, formally or informally, for making a complaint under this Policy or cooperating in the redressal process. Any person who engages in such retaliation will be subject to disciplinary action, up to and including termination of services.

10. INTERPRETATION AND APPLICATION

10.1. In case any question arises as to the interpretation of this policy, the interpretation which furthers equality and diversity ought to be adopted.

10.2. All matters relating to the issue of sexual harassment will be dealt with in accordance with the SAPIPL Policy on Prevention of Sexual Harassment at the Workplace, to the exclusion of the present Policy.