

CURIA INDIA PRIVATE LIMITED

ANTI-SEXUAL HARASSMENT POLICY

EFFECTIVE DATE: December 9, 2013

1ST REVISION: February 19, 2021

2ND REVISION: November 16, 2022

INTRODUCTION

Curia India Private Limited (formerly Albany Molecular Research Hyderabad Research Centre Private Limited) (hereinafter referred to as “Curia”) is committed to providing a workplace free from sexual harassment and discrimination. Consistent with Curia’s Code of Ethics and in recognition of each employee’s right to be treated with dignity and respect, Curia has a Harassment and Discrimination Policy that strictly prohibits all forms of harassment, including sexual harassment.

This Anti-Sexual Harassment Policy (“Policy”) supplements Curia’s Harassment and Discrimination Policy and establishes specific guidelines and procedures for dealing with sexual harassment of women in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “Act”) and the rules thereunder (“Rules”). In the event of conflict between this Policy and the Harassment and Discrimination Policy, the provisions that are more protective of the rights of the victim of sexual harassment shall prevail, to the maximum extent permissible under law. This Policy applies to all directors, officers, employees and agents of Curia and is deemed incorporated into the service terms and conditions of all such persons.

POLICY

Sexual harassment at the workplace is strictly forbidden. ‘Sexual Harassment’ is defined to include any of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- (i) Physical contact and advances;
- (ii) A demand or request for sexual favors;
- (iii) Making sexually colored remarks;
- (iv) Showing pornography; or
- (v) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

‘Workplace’, for the purpose of this Policy, is defined to include Curia’s premises as well as any place visited by an employee arising out of, or in the course of, employment, including transportation provided for the purpose of such travel.

Sexual Harassment is a violation of universally recognized human rights as well as the fundamental right to life with dignity under Article 21 of the Constitution of India. Curia strives to provide a safe work environment that is conducive to professional growth and will not tolerate Sexual Harassment of any kind at the Workplace. It is the personal responsibility of all directors, officers, employees and agents of Curia to ensure that their behavior is not contrary to this Policy.

GRIEVANCE PROCEDURE

A. Constitution of the Internal Committee

Curia India Private Limited (formerly Albany Molecular Research Hyderabad Research Centre Private Limited) has constituted a committee for the investigation and resolution of complaints of Sexual Harassment from an aggrieved woman employee, officer or director ¹ (the “Internal Committee”).

The composition of the Internal Committee shall at all times be as follows:

1. One (1) presiding officer, who shall be a senior-level woman employee;
2. Two (2) members from amongst employees committed to the cause of women or who have had experience in social work and at least one of whom shall have a background in law;
3. One (1) member who shall be a representative from a non-governmental organization committed to the cause of women or a person who is familiar with issues relating to Sexual Harassment.
4. At least 50% of the total number of members shall be women.

The presiding officer and members of the Internal Committee shall hold office for a period of three (3) years from the date of their nomination. The compensation payable to any non-employee members of the Internal Committee shall be as prescribed in the Rules. The names of the presiding

¹ In the event the aggrieved employee is not a woman or the complaint otherwise does not fall within the purview of the Act, the Internal Committee may have limited powers and jurisdiction under the Act (which deals only with sexual harassment of **women**) and therefore, in such cases, Curia’s HR Department shall handle the complaint in accordance with the disciplinary rules and other applicable policies of Curia, and such complaints shall fall outside the scope of this policy.

officer and members of the Internal Committee as well as any changes in the composition of the Internal Committee will be notified to employees from time to time.

B. Procedure for Resolution of Complaints

1. Any woman employee, officer or director of Curia India Private Limited (formerly Albany Molecular Research Hyderabad Research Centre Private Limited) who believes she is being, or has been, subjected to Sexual Harassment at the Workplace, may file a written complaint with the Internal Committee.
2. Any such complaint made to the Internal Committee must be filed within a period of three (3) months from the date of the alleged incident, or in case of a series of alleged incidents, within three (3) months from the date of last such incident; provided that for reasons recorded in writing, the Internal Committee may extend the time limit by an additional period not exceeding three (3) months if it is satisfied that the circumstances were such that they prevented the aggrieved employee from filing a complaint within the prescribed period.
3. If the aggrieved employee is unable for any reason to file a written complaint, the Internal Committee shall provide reasonable assistance and accommodation in accordance with law to enable the aggrieved employee to reduce the complaint to writing and initiate the process of investigation and resolution of the complaint. The complaint, along with all supporting documents and list of witnesses, if any, shall be submitted in six (6) copies in a sealed envelope addressed to the Presiding Officer of the Internal Committee. Within seven (7) working days of receipt of the complaint, a copy of all relevant documents shall be sent to the alleged offender (hereinafter, the “Respondent”) and the Respondent shall file a reply to the complaint along with supporting documents and list of witnesses, if any, within a period of ten (10) working days from receipt of the complaint and related documents.
4. Before initiating an inquiry into the complaint, if so requested by the aggrieved employee, the Internal Committee may attempt to settle the matter between the aggrieved employee and the Respondent through a conciliatory process; provided that no monetary settlement shall be made. If a settlement is reached, the Internal Committee shall record the settlement and forward copies of the settlement to the aggrieved employee, the Respondent and Curia’s HR department with a copy to the legal department (legal@curiaglobal.com). Once a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee, except if and to the extent, the Internal Committee is notified that the terms of the settlement have not been complied with by the Respondent.
5. In the absence of a settlement request or if a settlement cannot be reached within thirty (30) days of commencement of conciliation or if the terms of the settlement are not adhered to by

the Respondent, the Internal Committee shall conduct an inquiry into the complaint in accordance with Curia's Harassment and Discrimination Policy, internal rules relating to investigation of complaints and principles of natural justice. A quorum of three members of the Internal Committee, including the presiding officer, shall be required for the conduct of any inquiry proceedings. Neither the aggrieved employee nor the Respondent shall be represented by legal practitioners at any stage of the proceedings. The inquiry shall be completed within a period of ninety (90) days. Pending completion of the inquiry, the Internal Committee may grant such interim relief to the aggrieved employee as it may deem fit, including a recommendation to Curia's HR department to transfer the aggrieved employee to a different unit or department, restrain the Respondent from reporting on the performance of the aggrieved employee or grant leave of absence for a period not exceeding three (3) months. Curia's HR department shall implement such recommendation and send a report of such implementation to the Internal Committee.

6. Within a period of ten (10) working days from the date of completion of the inquiry, the Internal Committee shall provide a report of its findings to Curia's HR department with a copy to the legal department (legal@curiaglobal.com). Copies of the report shall be provided to both the aggrieved employee and the Respondent.
7. Where the Internal Committee arrives at a conclusion that the allegation against the Respondent has not been proven, it shall make a recommendation that no remedial action is required to be taken. However, if the Internal Committee concludes after due inquiry that the allegation was malicious or made with knowledge of falsity, or that any false evidence was knowingly presented, it may recommend appropriate penal action against the aggrieved employee or person concerned in accordance with applicable disciplinary rules; provided that a mere inability to substantiate the complaint shall not attract penal action under this paragraph.
8. Where the Internal Committee arrives at a conclusion that the allegation against the Respondent has been proven, it shall recommend appropriate remedial action which may include, but not be limited to:
 - a. Warning, reprimand or censure against the Respondent or the issue of a written apology by the Respondent to the aggrieved employee;
 - b. Action for misconduct in accordance with applicable disciplinary rules which may include, suspension, withholding of promotion, withholding of pay increases or termination from service;
 - c. Deduction from the salary/wages of the Respondent of such sums as may be considered appropriate to be paid over to the aggrieved employee or his or her legal

heirs (provided that where such amounts are unable to be recovered from the salary of the Respondent due to absence from, or cessation of, employment, the Respondent may be directed to pay such sum to the aggrieved employee); and/or

d. Mandatory counselling sessions or community service.

9. Curia's HR department shall act upon the recommendation within a period of sixty (60) working days from receipt.
10. Any person aggrieved by the findings, recommendations or inquiry proceedings of the Internal Committee or the non-implementation of recommendations by Curia may prefer an appeal to an appropriate court or tribunal in accordance with the Act and Rules, within a period of ninety (90) days of the recommendation.

C. Confidentiality

The names and addresses of the aggrieved woman/complainant, the Respondent and witnesses as well as all proceedings, including the statements and other material adduced as evidence, before the Internal Committee shall be kept strictly confidential, subject to applicable law. The Internal Committee shall instruct all concerned parties before it and their representatives to maintain strict confidentiality of the complaint and inquiry proceedings in all respects.

D. Rights and Actions of Third Parties

Where a woman who is not an employee, officer or director of Curia alleges to have been a victim of Sexual Harassment at the Workplace and the alleged offender is an Curia employee, officer or director, the aggrieved woman shall be entitled to file a complaint before the Internal Committee under this Policy if, and to the extent, so required by the Act and Rules.

Where the alleged offender in an act of Sexual Harassment at the Workplace is a third party who is not an employee, officer or director of Curia, Curia shall offer reasonable assistance to the aggrieved employee in accordance with law to enable such person to take necessary preventive and remedial / corrective action.

PROHIBITION OF RETALIATION

No person shall be subjected to any retaliation whatsoever for anything said or done in relation to complaints, proceedings or other acts or omissions under this Policy. Any retaliation in violation of this Policy will be treated as serious misconduct attracting penal action in accordance with Curia's disciplinary rules.

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QUESTIONS

For any questions with respect to this Policy, please contact your HR manager or representative, or Ms. Seená Sankar, Company Secretary at seena.sankar@curiaglobal.com or Ms. Swarnapradha Shreenivas, Legal & Compliance Senior Counsel at Swarnapradha.Shreenivas@curiaglobal.com.