

**POLICY ON
PREVENTION OF
SEXUAL
HARASSMENT
(POSH)**

Version: 3

Vision Rx Lab Private Limited (formerly known as GKB Rx Lens Pvt. Ltd.)

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POLICY FOR PREVENTION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

1. POLICY STATEMENT:

The Company is committed to creating and maintaining a working environment which is cooperative, pleasant and free from any type of harassment. Sexual Harassment by an employee to another employee will not be permitted, tolerated or condoned.

2. OBJECTIVE OF THE POLICY:

- a. The Policy aims at evolving a permanent mechanism for prevention, prohibition and redressal of sexual harassment of any nature by an employee to another employee at the Workplace.
- b. To sensitize the employees about the recognition of the rights of the other employees and their obligation towards the fellow employees to treat them with dignity and self-respect and to make them aware that company is determined to promote working environment in which persons of both the genders complement each other as equals.
- c. To ensure complete compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder and uphold the commitment of the company to provide an environment free of discrimination of any nature of employees.
- d. The Policy is Gender Neutral. The aim of the policy is not only to address the complaint by a female employee against male employee but would also apply to a complaint of sexual harassment from male against female employee, male to male and female to female employees.

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3. Applicability:

- a. This policy shall apply to all the employees of the Company who are on the rolls including trainees, probationers, temporary and contractual staff and others who are engaged through Vendors and Service Providers.
- b. This policy shall not only cover all types of sexual harassment at the workplace, but covers also any conduct involving employees outside the workplace including while travelling in the Company provided transport, business trips, off site training programmes, social gathering of employees organised by the Company etc.

4. DEFINITIONS:

- 4.1. Complainant /Aggrieved Employee** Refers to any employee who has lodged a complaint of sexual harassment at workplace.
- 4.2. Respondent Employee:** Refers to any employee against whom the complaint of sexual harassment has been lodged
- 4.3. Workplace:** includes all the offices of the company and departments, branches situated anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey, the places where the employees of the company have met for social, sports or extracurricular activities organized by the company.
- 4.4. Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely;-
 - (i) Physical contact and advances; or
 - (ii) A demand or request for sexual favours; or
 - (iii) Making sexually coloured remarks; or
 - (iv) Showing pornography; or



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- (v) 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 amounts to sexual harassment: -

- (i) Implied or explicit promise of preferential treatment in employment; or
- (ii) Implied or explicit threat of detrimental treatment in employment; or
- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with the work or creating an intimidating or offensive or hostile work environment for the employee; or
- (v) Humiliating treatment likely to affect employee's health or safety

4.5 Internal Committee– Internal Committee constituted under this policy and shall also be treated as Internal committee as envisaged Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act and Rules thereunder.

4.5. Disciplinary Authority: Disciplinary Authority means, authority specified by the company from time to time and notified for the information of the employees. The Company may appoint or specify different disciplinary authority for employees at different levels or grades.

4.6. Appellate Authority: Appellate Authority means, authority specified by the company from time to time and notified for the information of the employees. The Company may appoint or specify different Appellate Authority for employees at different levels or grades.

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5. INTERNAL COMMITTEE:

5.1. The management shall constitute Internal Committee consisting of the following: -

- a) A presiding officer who shall be a woman employed at a Senior level at work place from among the employees.
- b) Not less than two members from amongst employees preferably committed to cause of the women or who had experience in social work or have a legal knowledge.
- c) One member from amongst non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to harassment at workplace including sexual harassment.

5.2. The management shall ensure that at least one half of the total members so nominated shall be women.

6. COMPLAINT PROCEDURE:

6.1. Any aggrieved employee may make a complaint in writing, a complaint of harassment at workplace to the Internal Committee giving the details of the harassment meted out to him or her within a period of 90 days from the date of the incident and in case of a series of incidents, within a period of 90 days from the date of last incident. The complaint by an aggrieved employee be sent either by post/email or given in person to the Presiding Officer of the Internal Committee or to any other Member of the Committee.

6.2. The Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding 90 days, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.

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6.3. Where the employee is unable to make a complaint on account of his or her physical or mental incapacity or death or otherwise, his or her legal heir may make a complaint under this section. It is, however, pertinent to state that where the aggrieved employee is unable to make a complaint on account of his or her physical incapacity, a complaint may be filed by—

- (i) his or her relative or friend; or
- (ii) his or her co-worker; or
- (iii) any person who has knowledge of the incident, with the written consent of the aggrieved employee.

7. PROCEDURE TO BE FOLLOWED POST RECEIPT OF COMPLAINT:

7.1 On receipt of the complaint the Internal Committee shall investigate and enquire into the complaint in accordance with principles of natural justice. The enquiry shall be completed within a period of 90 days of receipt of the complaint.

7.2 The parties shall not be allowed to bring any legal practitioner to represent them at any stage of the inquiry proceedings before the Internal Committee.

8. IMPLEMENTATION OF THE RECOMMENDATIONS OF THE INTERNAL COMMITTEE:

After completion of the enquiry, the Internal Committee shall forward its report with its recommendations to the Disciplinary Authority. The disciplinary authority shall examine the report and thereafter award the punishment in accordance with the disciplinary policy of the Company which includes written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the services or undergoing counseling session or carrying out

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community service. The disciplinary action shall be completed within 60 days of the receipt of the recommendations of the Internal Committee.

9. APPEAL:

The Complainant or the Respondent if they are aggrieved by the Findings/Recommendations or the Orders of the Disciplinary Authority may prefer an Appeal before THE CHAIRMAN who is specified as the Appellate Authority within 90 days of the submission of the Findings by the Internal Committee. The Appeal shall be made by the aggrieved person in writing with three copies. The Appellate Authority shall dispose of the Appeal within 60 days.

10. CONFIDENTIALITY& NON DISCLOSURE:

The identity and address of the aggrieved employee, respondent and witnesses, any information relating to conciliation and enquiry proceedings, recommendations of the Internal Committee, the action taken by the employer shall be treated as confidential and shall not be disclose to anyone who is not authorized to receive the said information.

11. OBLIGATIONS OF THE MANAGEMENT:

- a) The Management will also initiate action under the Indian Penal Code or any other law for the time being in force, against a perpetrator, where the perpetrator is not an employee of the establishment and there is complaint of Sexual Harassment against the said perpetrator in the workplace where the harassment took place.
- b) The Management will create awareness amongst employee on gender sensitivity and harassment free workplace.

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12. POWER AND OTHER FUNCTIONS OF THE INTERNAL COMMITTEE :

12.1 The Internal Committee shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:—

- (a) summoning and enforcing the attendance of any person and examining him on oath;
- (b) requiring the discovery and production of documents; and
- (c) any other matter which may be prescribed.

12.2 The Internal Committee shall meet periodically and review the measures taken for creating awareness among the employees on gender sensitivity and suggest further measures for enhancing the level of sensitivity on the subject among the employees.

13. PENALTY:

a) Punishment for false or malicious complaint and false evidence.

Where the *Internal Committee* arrives at a conclusion that the allegation against the Respondent is malicious, false or has produced any forged or misleading document, it may recommend to the employer to take action against the Complainant in accordance with the disciplinary Policy of the Company.

b) Punishment for false evidence or producing forged or misleading documents:

Where the Internal Committee arrives at a conclusion that during the inquiry any witness (including the Complainant and the Respondent) has given false evidence or produced any forged or misleading



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document, it may recommend to the employer of the witness to take action against such person.

c) Penalty for publication or making known contents of complaint and inquiry proceedings:

Where any person, entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action, publishes or makes known the contents of complaint or inquiry proceedings, he/she shall be liable for penalty in accordance with any breach of confidentiality the person concerned shall be liable for penalty in accordance with the provisions of service rules applicable to the said person or with penalty of Rs. 5000/- which may be recovered from the salary.

- 14.** The Internal Committee, Disciplinary Authority and Appellate Authority shall ensure complete compliance principles of natural justice and provisions of law.
- 15.** The Company may make any alteration or amendment or rescind any clauses of this policy as and when it finds necessary to ensure complete compliance to the provisions of the applicable law and to ensure that the policy completely serves the purpose for which it has been laid down.



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NOTICE

CONSTITUTION OF INTERNAL COMMITTEE FOR INVESTIGATION OF COMPLAINTS RELATING TO SEXUAL HARASSMENT AT WORK PLACE.

The Company has constituted the internal complaint committee consisting of the following member at Head Office

- Ms. Rekha Roy presiding officer
 Email rekharoy@vrxlab.com Off.Tel.No: 9831781073
- Ms. Arpita Roy Member
 Email :arpitaroy@vrxlab.com Off.Tel.No.8420111598
- Mr. Tushar Das Member
 Email :tushardas@vrxlab.comOff.Tel.No.9073386045
- Ms. Bipasha Mukherjee External Member
 Email bipasha.adv@gmail.com Off.Tel.No.9830422826

The regional internal compliance committee details are also given below:-

POSH Local Committee Formation of Vision Rx Lab Private Limited					
SL. No.	Location	Chairperson	External Member	Central Committee Member	Local Committee Member
1	Kolkata H.O.	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Arpita Roy (M: 8420111598)
2	Siliguri	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Ranjit Jha (M: 9831227695)
3	Guwahati	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Amit Ghosh (M: 9864066427)
4	Patna	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Abhisek Kumar (M: 9123261048)
5	Ranchi	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Vikram Saran (M: 7549960070)

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POSH Local Committee Formation of Vision Rx Lab Private Limited					
SL. No.	Location	Chairperson	NGO Member	Central Committee Member	Local Committee Member
6	BBSR	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Somnath Biswas (M: 8328986066)
7	GGN	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	SashiKumabat (M: 8287637106)
8	Ludhiana	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Lalit Jha (M: 7080866943)
9	Rajouri Garden	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	T N Tripathi (M: 9910027216)
10	Jaipur	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Gaurav Khatri (M: 9828167568)
11	Noida	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Abhijit Choudhury (M: 9871698785)
12	Lucknow	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Mukund Jaisawal (M: 8009831117)
13	Mumbai	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Lipsa Jieguny Udwardia (M: 7738092192)
14	Dadar	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	DuttaguruTandel (M: 9867004373)
15	Pune	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Deep Chakraborty (M: 9830662652)
16	Ahmedabad	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Satish Patel (M: 9978995216)
17	Nagpur	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Navneet Pathak (M: 7721027798)
18	Indore	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Madhur Jain (M: 9993588837)
19	Hyderabad	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Prashnat Singh (M: 9849062956)

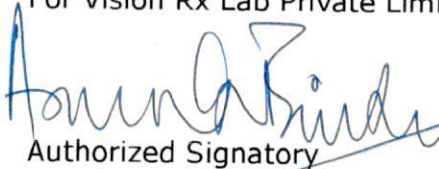


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POSH Local Committee Formation of Vision Rx Lab Private Limited					
SL. No.	Location	Chairperson	NGO Member	Central Committee Member	Local Committee Member
20	Vizag	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Rishikesh Chitralla (M: 9949062780)
21	Bangalore	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Jachinta P (M: 8067307001)
22	Hubli	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Gangaram (M: 9886368358)
23	Mangalore	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Harikirthi (M: 9900080157)
24	Chennai	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	G Vidya (M: 8754478112)
29	Madurai	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Chinna Swami (M: 9500020766)
30	Coimbatore	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Alagarasan (M: 9840878732)
31	Cochin	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Telma P (M: 9074218153)
32	Calicut	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Bindu K (M: 9846384005)
33	Trivandam	Rekha Roy (M: 9831781073)	Bipasha Mukherjee (M: 9830422826)	Tushar Das (M: 9073386045)	Rajesh A (M: 9895738942)

The formation of the committee shall be effective from 1st April 2021 and shall be in force for a period of 3 years unless otherwise modified.

For Vision Rx Lab Private Limited


Authorized Signatory



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NOTICE

1. Punishment for false or malicious complaint and false evidence.

Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the employee or the person who has made the complaint in accordance with the provisions of the service rules applicable to her or him.

Note: Mere inability to substantiate a complaint or provide adequate proof need not attract action against complainant under this section.

2. Punishment for false evidence or producing forged or misleading documents:

Where the Internal Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness to take action in accordance with the provisions of the service rules applicable to the said witness.

3. Penalty for publication or making known contents of complaint and inquiry proceedings

Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this policy, he shall be liable for penalty in accordance with the provisions of the service rules as applicable to the said person or with penalty of Rs.5,000/- which may be recovered from the salary.

Date:

For

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