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Prevention of Sexual Harassment (POSH) Policy

1. Introduction:

Bigtec Labs is committed to fostering a safe, respectful, and inclusive workplace. Sexual harassment is recognized as a violation of fundamental rights under the Constitution of India and the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* ("POSH Act").

2. Scope & Applicability:

This policy applies to:

- All employees (full-time, part-time, temporary, probationers, trainees, interns, consultants, volunteers).
- Contractors, vendors, service providers, visitors, and any third party associated with Bigtec Labs.
- All workplaces, including offices, labs, client locations, field sites, and offsite events (business travel, training, conferences, company-sponsored social events, and virtual/digital workplaces).

3. Definitions:

Sexual Harassment includes any unwelcome conduct of a sexual nature, verbal, non-verbal, written, physical, or digital. Illustrations include but are not limited to:

- Physical contact, advances, leering, whistling, or suggestive gestures.
- Demands or requests for sexual favours.
- Sexually coloured remarks, jokes, innuendos, or gossip.
- Display of pornographic material or offensive content (including digital).
- Repeated requests for dates despite refusal.
- Creating a hostile, intimidating, or humiliating work environment.

Aggrieved Person: Any individual (irrespective of gender) alleging sexual harassment at the workplace.

Respondent: The person against whom the complaint is made.

Workplace: Any physical or virtual place connected with Bigtec Labs' business.

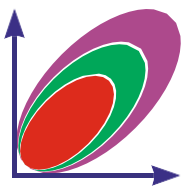
4. Roles & Responsibilities:

- **Employees:** Respect others' dignity, avoid engaging in harassment, support colleagues in rejecting unwelcome behaviour, and report incidents promptly.
- **Managers/Leaders:** Actively prevent harassment, handle complaints sensitively, ensure no retaliation, and promote awareness.
- **Employer (Bigtec Labs):** Ensure a robust redressal mechanism, periodic training, awareness programs, and compliance reporting.

5. Internal Complaints Committee (ICC):

In compliance with the POSH Act:

- The ICC will be chaired by a **woman Presiding Officer** at a senior level.
- At least **50% members will be women**.
- Tenure of members: 3 years.
- ICC will function independently and confidentially.
- Contact details of ICC members will be displayed at all Bigtec offices. Please refer to Annexure A for details about the current ICC members.



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6. Awareness & Training:

- Mandatory **POSH induction training** for all employees within 30 days of joining.
- Annual **workshops, seminars, and refresher courses**.
- E-learning modules and case study-based training.

7. Complaint Mechanism:

- Complaints must be filed **within 3 months** of the incident (extendable by another 3 months if justified).
- Complaints can be made **in writing or orally** (with assistance from ICC to document).
- Third parties (colleague, relative, friend, witness) may file if the aggrieved person is unable to.
- Complaints may be emailed to the ICC, submitted in hard copy, or reported confidentially via HR.

8. Redressal Process:

1. **Conciliation (Optional):** At the request of the complainant, ICC may attempt conciliation (excluding monetary settlement).
2. **Formal Inquiry:**
 - Notice sent to respondent within 7 working days.
 - Respondent to reply within 10 working days.
 - Inquiry to follow **principles of natural justice**.
 - Inquiry to be completed within **90 days**.
 - ICC report to be submitted to management within 10 days of conclusion.
 - Employer to act on recommendations within 60 days.
3. **Interim Relief:** ICC may recommend transfer, paid leave (up to 3 months), change of reporting lines, or other protective measures for the Complainant.

9. Possible Actions

Depending on the severity of misconduct:

- Written apology, counselling, or warning.
- Withholding promotion/increment, suspension, or transfer.
- Termination of employment/contract.
- Police complaint if required under IPC.

10. Malicious Complaints

- All proceedings, identities, and reports remain strictly confidential.
- Disclosure will invite disciplinary/legal action.

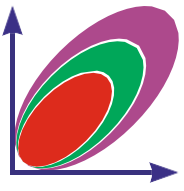
11. Appeal

Any party aggrieved by the ICC's recommendations may appeal to the Appellate Authority (as per the Act) within 90 days.

12. Policy Review

This policy will be reviewed annually, or earlier if required by law or organizational needs.

Effective Date: October 06, 2025



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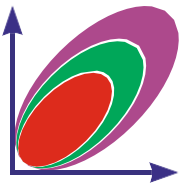
Annexure A: Internal Complaints Committee at Bigtec Labs

Internal CC Members

1. Dr. Shilpa Sanjeeva - 9740891515 (shilpa.ks@bigtec.co.in)
2. Ms. Megha Nayak - 9900758866 (megha.nayak@bigtec.co.in)
3. Mr. Madhu Gopalakrishnan - 9448256411 (madhu.g@bigtec.co.in)
4. Mr. Abhishek Haldar - 9831622985 (abhishek.h@bigtec.co.in)

External Member

Ms. Aparna Ravi



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POSH Policy – Frequently Asked Questions

1. What is sexual harassment?

Sexual harassment includes any unwelcome conduct of a sexual nature—verbal, non-verbal, physical, written, or digital—that creates a hostile, intimidating, or offensive work environment. Examples include unwanted touching, repeated requests for dates, sexually colored remarks, sharing offensive images, or displaying pornography.

2. Does this policy apply to men as well as women?

Yes. While the POSH Act was framed with women in mind, Bigtec's POSH Policy is **gender neutral**. Any employee, irrespective of gender identity, can file a complaint if they face sexual harassment.

3. What is the Internal Complaints Committee (ICC)?

The ICC is a legally mandated body that:

- Receives and investigates complaints of sexual harassment.
- Is chaired by a senior woman employee.
- Has at least 50% women members.
- Includes one external expert with legal/social experience.
- Functions confidentially and independently.

4. How do I file a complaint?

- Submit a written or verbal complaint to any ICC member or HR.
- If you cannot write, the ICC will assist in documenting your complaint.
- Complaints must normally be filed within 3 months of the incident (extendable by another 3 months if justified).
- Third parties (e.g., relatives, co-workers, witnesses) may file on your behalf if you are unable to.

5. Will my complaint be kept confidential?

Yes. The identity of the complainant, respondent, and witnesses, as well as inquiry details, are kept strictly confidential. Breach of confidentiality can lead to disciplinary action.

6. Can I face retaliation for filing a complaint?

No. Retaliation in any form - demotion, threats, exclusion, or adverse treatment - is strictly prohibited. If you face retaliation, report it immediately to the ICC or HR.

7. What are the principles of natural justice?

The ICC follows principles of natural justice to ensure fairness:

- **Right to be heard:** Both complainant and respondent get equal opportunity to present their side, evidence, and witnesses.
- **No bias:** ICC members must be impartial and free of conflict of interest.
- **Reasoned decision:** ICC's findings must be based on evidence and explained clearly.
- **Timely process:** Inquiry to be completed within 90 days; action taken within 60 days.
- **Transparency & fairness:** Both parties are kept informed of the process.

8. What if the complaint is found to be false or malicious?

If the ICC concludes a complaint was made maliciously or with forged evidence, disciplinary action may be taken against the complainant. However, mere inability to prove an allegation is not considered malicious.

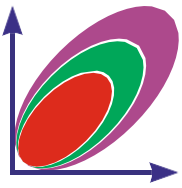
9. What are the possible consequences if harassment is proved?

Depending on severity, actions may include:

- Written apology, counselling, or warning.
- Withholding promotion or increments.
- Suspension or termination.
- Filing of a police complaint if required.

10. What happens if the respondent is a contractor, vendor, or visitor?

The ICC can investigate such cases as well. If harassment by a third party is proven, Bigtec will take appropriate action, which may include terminating the business relationship and/or filing a police complaint.



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11. Can I withdraw my complaint once filed?

Yes, but the ICC may still proceed if it believes the matter is serious or involves broader workplace safety issues.

12. How long does the inquiry take?

- Complaint filed → notice to respondent within 7 days.
- Inquiry completed within **90 days**.
- ICC report submitted within **10 days** of completion.
- Employer must act within **60 days** of report.

13. Can I appeal the ICC's decision?

Yes. Either party can appeal to the statutory **Appellate Authority** under the POSH Act within **90 days** of receiving the ICC's recommendations.

14. What if I witness harassment but am not the victim?

You are encouraged to report it to the ICC or HR. Witness reports are taken seriously and help protect workplace safety.