

**POLICY**

CD NUMBER: P-0872	VERSION: 2.0	PAGE 1 of 11
--------------------------	---------------------	---------------------

TITLE: India Prevent Sexual Harassment of Women in the Workplace	
SUPERSEDES: P-0872 v1.0	EFFECTIVE DATE: 22 Dec 2025

This document contains Fortrea confidential and proprietary content. The reproduction, distribution, modification, performance or other use of this document, or any of the information contained herein, in whole or in part, without the express written consent of Fortrea is prohibited.

Owning Unit	HR
Owning Department	HR - Employee Relations
Impacted Units	EHS, RCQA, CPS, Global Commercial Operations (GCO), Legal, GCD, HR, IT, Fortrea Corporate Administration (FCA), MDD,
Impacted Department / Functional Area	Refer to QualityDocs Metadata fields
CD Approval	Refer to QualityDocs for approval details

CD NUMBER: P-0872	VERSION: 2.0	PAGE 2 of 11
-------------------	--------------	--------------

1. Purpose and Scope

This Policy has been developed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules established thereunder (“the Act”).

This Policy is applicable for all three below mentioned entities:

- Fortrea Development India Private Limited,
- Fortrea Clinical Development Private Limited, and
- Fortrea Scientific Private Limited.

For the purpose of this Policy, the term “Company” shall collectively refer to the above-mentioned entities.

This Policy applies to all:

- All employees of the Company's direct or indirect subsidiaries;
- All workers whether engaged via a third party or independently contracted;
- All paid or unpaid Company volunteer resources, trainees or similarly situated apprentices; and
- All workers whether engaged under an express or implied contract.

The Act establishes several detailed requirements in order to build a safe and accepting environment.

- a. An internal committee (*defined below*) in place comprising of in-house employees and external experienced members in the field of social activities and upliftment of women and with a fair representation of women representatives therein, as a collective authority that is independent of the management in order to investigate and deal with sexual harassment cases.
- b. Developing, creating awareness of and implementing a comprehensive policy on sexual harassment at workplace, its consequences and procedure for complaints thereof.
- c. Making details and decision of the proceedings of the internal committee (*defined below*) public, by filing annual returns with regulatory authorities, without however disclosure of the name, address or identifying factors of the Aggrieved Woman (*defined below*) or Respondent (*defined below*) or witnesses.
- d. Providing redressal to the Aggrieved Woman and imposing appropriate consequences on the Respondent.

2. Policy Statements

Roles and Responsibilities

a. Responsibility of the Individual:

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- Refusing to participate in any activity which constitutes harassment.
- Supporting the person to reject unwelcome behavior; or
- Acting as a witness if the person being harassed decides to lodge a complaint.

All are encouraged to advise others of behavior as classified in IV (*DEFINITIONS/REFERENCE*) of the Policy that is unwelcome. Often, some unwanted behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately the opportunity to modify or stop their offensive behavior.

b. Responsibilities of Managers:

All managers are accountable to oversee a harassment free environment and equal treatment for all. Further managers must monitor that complaints will be taken seriously and that the Aggrieved woman, Respondent/s, or witnesses are not victimized in any way.

c. Definitions:

- i. **Aggrieved Woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent and includes contractual, temporary, visitors.
- ii. **Employer:** A person responsible for management, supervision and control of the Workplace.
- iii. **Respondent:** A person against whom a complaint of sexual harassment has been made by the Aggrieved Woman.
- iv. **Sexual harassment:** may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee of the Company and someone with whom the employee deals within the course of their work who is not employed by the Company.

Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication)

Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person to whom the behavior or conduct was directed, namely:

CD NUMBER: P-0872	VERSION: 2.0	PAGE 4 of 11
-------------------	--------------	--------------

- Physical contact and advances;
- Demand or request for sexual favors;
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, etc;
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- Giving gifts or leaving objects that are sexually suggestive;
- Even teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- Persistent watching, following, contracting of a person; and
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to 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 the present or future employment status;
- Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment is likely to affect the person's health or safety;
- The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the Aggrieved Woman.

v. **Special Educator:** A professional trained to work with children or students with disabilities or special needs, who provides specialized instruction and support services within the scope of their employment or engagement.

vi. **Workplace:** In addition to the place of work [head office / branch offices] it shall also include any place where the Aggrieved Woman or the Respondent visits in connection with their work, during the course of any/or arising out of employment / contract / engagement with the Company's India operations, including transportation provided for

CD NUMBER: P-0872	VERSION: 2.0	PAGE 5 of 11
-------------------	--------------	--------------

undertaking such a journey and any electronic communications, business-related social gatherings, and lodging accommodations.

d. References:

Policies are available on Service Central.

Corporate Policies can be found on the Company intranet i.e Passport.

e. Policy:

The Prevention of Sexual Harassment of Women in the Workplace Policy (“Policy”) intends to provide protection against sexual harassment of women at workplace and the prevention and remediation of complaints of sexual harassment and matters related to it.

i. Redressed Mechanism-Formal Intervention:

In compliance with the Act, an individual believed to be an Aggrieved Woman should lodge a written complaint with the Internal Committee for formal redressal. Verbal complaints will be memorialized in writing subject to written acknowledgement by the Aggrieved Woman.

ii. Internal Committee (“IC or “COMMITTEE”):

To prevent instances of sexual harassment and to ensure timely and effective handling of related complaints, an “Internal Committee” has been established at each entity location. Contact details for each committee are appropriately shared with all covered individuals. The Committee at each location comprises:

- Presiding Officer: A woman employed at a senior level in the organization or workplace;
- At least 2 (two) members from amongst employees, committed to the cause of women and/or having legal knowledge;
- 1 (one) external member, from amongst non-governmental organizations or associations committed to the cause of women and/or having legal knowledge;
- At least half of the total IC members are women;
- The Committee is responsible for:
 - receiving complaints of sexual harassment at the Workplace;
 - initiating and conducting inquiries as per the established timelines and procedure;
 - submitting findings and recommendations of inquiries;
 - coordinating with the employer in implementing appropriate action;
 - maintaining strict confidentiality throughout the process as per the established guidelines;
 - and submitting annual reports in the prescribed format under the Act.
- Current nominated members of the Committees are given in **Annexure A**. Company reserves the right to reconstitute the Committee, including accepting the resignation or initiating the removal of any member, at any time as deemed necessary or as required under the law.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 6 of 11
-------------------	--------------	--------------

iii. **Lodging a Complaint:**

The Aggrieved Woman needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the Committee members at the Workplace and/or to the Poshcommittee-India@fortrea.com that comprises of the Committee members. The complaint must be lodged within 3 (three) months from the date of the incident (or the last incident). The Committee can extend the timeline by another 3 (three) months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint. Provided that where such a complaint cannot be made in writing, the Presiding Officer or any member of the Committee shall render reasonable assistance to the Aggrieved Woman for making the complaint in writing.

If the Aggrieved Woman is unable to lodge the complaint due to incapacity or death, the following may do so on her behalf, with her written consent.

- Legal heir, relative or friend.
- Co-worker;
- An officer of the National Commission for Women or State Women's Commission or
- A person who has knowledge of the incident.

Additionally, in the event of the Aggrieved Woman's mental incapacity, a Special Educator, a qualified psychiatrist, psychologist, or the guardian or authority under whose care she is receiving treatment or care, is permitted to lodge a complaint on behalf of such Aggrieved Woman.

If the initial complaint is made to a person other than a Committee member, upon receiving such a complaint, the responsibility of the recipient is to report the same to the Committee immediately.

Wherever possible the Company endeavours to protect the integrity of each complaint received in seeking good faith closure without undue delays.

iv. **Resolution Procedure Through Conciliation:**

- Once the complaint is received, but before initiating the inquiry, the Committee may take steps to conciliate the complaint between the Aggrieved Woman and the Respondent; this is only if requested by the Aggrieved Woman.
- It is made clear to all parties that conciliation in itself does not necessarily mean acceptance of complaint by the Respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.
- In case a settlement is arrived at, the Committee records and reports the same to the Company for taking appropriate action. The Committee will make a reasonable effort to complete the resolution procedure through conciliation within 2 (two) weeks of receiving the complaint.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 7 of 11
-------------------	--------------	--------------

- The Committee provides copies of the settlement to Aggrieved Woman and Respondent. Once the action is implemented, no further inquiry is conducted.

v. **Resolution Procedure Through Formal Inquiry:**

Conducting Inquiry - The Committee initiates inquiry in the following cases:

- No conciliation is requested by Aggrieved Woman.
- Conciliation has not resulted in any settlement; or
- Aggrieved Woman informs the Committee that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent.

The Committee will endeavor to begin an inquiry into the complaint within a period of 1 week of its receipt of the original complaint/closure of conciliation/repeat complaint.

vi. **Manner of Inquiry into Complaint:**

- Aggrieved Woman should submit the complaint along with supporting documents and the names of the witnesses.
- Upon receipt of the complaint, the Committee will forward a copy of the complaint to the Respondent within 7 (seven) working days.
- The Respondent must submit a response along with all supporting documents within 10 (ten) working days of receiving the complaint copy.
- No legal practitioner can represent any party at any stage of the inquiry procedure.
- The Internal Committee makes inquiry into the complaint in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of 3 (three) Committee members, including the Presiding Officer, are present.

vii. **Interim Relief:**

During pendency of the inquiry, on a written request made by the Aggrieved Woman, the Committee may recommend to the Company to:

- Transfer the Aggrieved Woman or the Respondent to any other workplace.
- Grant leave to the Aggrieved Woman of maximum 3 (three) months, in addition to the leave she would be otherwise entitled.
- Prevent the Respondent from assessing Aggrieved Woman work performance.
- Grant such other relief as may be appropriate.

Once the recommendations for interim relief are implemented, the Company will inform the Committee regarding the same.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 8 of 11
-------------------	--------------	--------------

viii. **Termination of Inquiry or Ex-Parte Order:**

Internal Committee may terminate the inquiry or give ex-parte order, if Aggrieved Woman or Respondent respectively is absent for 3 consecutive hearings, without reason. Prior to such termination or ex-parte proceedings, a written notice of 15 days shall be issued to the concerned party.

ix. **Inquiry Procedure:**

- All proceedings of the inquiry are documented. The Committee interviews the Respondent separately and impartially. The Committee states exactly what the allegation is and who has made the allegation. The Respondent is given full opportunity to respond and provide any evidence, etc. Detailed notes of the meetings are prepared which may be shared with the Respondent and Aggrieved Woman upon request. Any witnesses produced by the Respondent are also interviewed and statements are taken.
- If the Aggrieved Woman or Respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements.
- In case Aggrieved Woman or Respondent seek to ask questions to the other party, they may give them to the Committee which will ask them and record the response or facilitate the cross-examination face to face.
- All inquiries, including the submission of the inquiry report, must be completed within 90 (ninety) days from the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties.

x. **Considerations while preparing Inquiry Report:**

While preparing the findings/recommendations, the following are considered:

- Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature.
- Whether the allegations or events follow logically and reasonably from the evidence.
- Credibility of Aggrieved woman, Respondent, witnesses and evidence.
- Other similar facts, evidence, e.g. if there have been any previous accounts of harassment pertaining to the Respondent.
- Whether both parties have been given an opportunity of being heard; and
- Whether a copy of the proceedings was made available to both parties enabling them to make representation against the findings.

A copy of the final findings is shared with the Aggrieved Woman and the Respondent to give them an opportunity to make a representation on the findings to the Committee.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 9 of 11
-------------------	--------------	--------------

xi. **Action to be taken after Inquiry:**

- Within 10 (ten) days of completion of the inquiry, the Committee will submit its report containing the findings and recommendations to the Company.
- The findings and recommendations are reached from the facts established and are recorded accurately.
- If the situation so requires, or upon request of the Aggrieved Woman, Respondent or witness, management may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

xii. **Complaint Unsubstantiated:**

- Where the Committee arrives at the conclusion that the allegation against the Respondent has not been proved, it recommends to the Company that no action is required to be taken in this matter.
- Further, the Committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

xiii. **Complaint Substantiated:**

Where the Committee arrives at the conclusion that the allegation against the Respondent has been proved, it liaises with the Company's Human Resources team to recommend appropriate action for sexual harassment as misconduct. Such action will be taken in accordance with the applicable service rules and policies, and may include:

- Counseling
- Censure or reprimand
- Apology to be tendered by Respondent
- Written warning
- Withholding promotion and/or increments
- Suspension
- Termination; or
- Or any other action that the management may deem fit.

The Company shall act upon the recommendations within 60 (sixty) days and confirm to the Committee post implementation of the actions, follow up with the Aggrieved Woman occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow-up is undertaken by the Aggrieved Woman's manager supported by Human Resource Team.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 10 of 11
-------------------	--------------	---------------

xiv. **False Complaints / Malicious Allegations Substantiated:**

- Where the Committee arrives at the conclusion that the allegation against the Respondent is malicious, the Aggrieved Woman or any other person making the complaint has made the complaint knowing it to be false, or the Aggrieved Woman 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 woman or the person making the complaint.
- The action recommended should be similar to that proposed for the Respondent in case of substantiated complaints.
- While deciding malicious intent, the Committee should consider that a mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

xv. **Confidentiality:**

- The identity of the Aggrieved Woman, Respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the Committees, action taken by the Company is considered confidential, and is not to be published or made known to public or media.
- Any person contravening the confidentiality clauses is subject to disciplinary action.

xvi. **Appeal:**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made may appeal to the appellate authority in accordance with the Act, within 90 (ninety) days of the recommendations being communicated.

f. Compliance:

Company personnel who have violated any Company Policy may be subject to disciplinary action in accordance with prevailing policies and procedures in force.

Individuals who become aware of but fail to notify Human Resources of suspected or reported violations of this Policy may also be subject to disciplinary action, as the Company may deem fit.

Individuals who are not employees (including contingent workers) of the Company will be subject to discipline according to the terms and conditions of their agreement with the Company or the agreement with the contracted service provider.

CD NUMBER: P-0872	VERSION: 2.0	PAGE 11 of 11
--------------------------	---------------------	----------------------

g. Inquiries:

Employees and managers should direct their questions about sexual harassment to their Human Resources Representative or the Legal Department.

Employees and managers should direct Policy questions through Service Central.

3. Supplementary Information Needed to Support the Policy

N/A

4. Definitions and Abbreviations

Terminology and Acronyms can be accessed from the Fortrea Glossary.

5. Appendices

Appendix #	Appendix Title
N/A	N/A

6. Summary of Changes

Change Type	Summary of Change
Process Change	POSH Policy changes as per the legal requirements