

DISCRIMINATION AND ANTI-HARASSMENT POLICY

A. INTENT

Vedanta Ltd. (Company, we) aims to create and maintain a work environment in which people are treated with dignity, decency and respect. We strive to create an environment characterized by mutual trust and the absence of intimidation, oppression, and exploitation, free of discrimination or harassment of any kind. Through implementation of this policy and by education, mentoring and guidance of employees, Vedanta will seek to prevent, correct, and discipline behaviour that violates this policy. All employees working on Vedanta-managed and/or Vedanta-operated sites, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur.

B. TYPES OF HARASSMENT

The following (but not limited) are considered forms of harassment and will warrant investigation and appropriate action:

Sexual Harassment: The definition, scope and repercussion are decided by "Internal Complaints Committee" (ICC) as per the company's "Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace". (Link [here](#))

Other (Non-sexual) harassment & Discrimination:

- i. "Bullying / Workplace Violence" – Defined as a behavioural (offensive, intimidating, malicious, insulting etc) trait which, may turn into harassment if it applies to protected characteristics (typically under law) such as age, disability, gender, sex, race, sexual orientation, religion etc. We do not tolerate violent acts or threats of violence, verbal, non-verbal or in writing. We will not tolerate fighting, bullying, coercion, or use of abusive or threatening words or actions directed to, about, or against any employee of the company.
- ii. "Discrimination" – Defined as unfair treatment (e.g., but not limited to, impediments to promotion) on the basis of protected characteristics mentioned in point i. Any form of discrimination towards an employee is strictly prohibited, including but not limited on the basis of race, skin colour, caste, religion, ethnicity, national origin, sex (including pregnancy), age, disability, class, place of birth, HIV status, sexual orientation, gender identity, marital status, religious belief or lack of religious belief, life expectancy, or any other status protected by the laws or regulations in the locations where we operate.

The policy should be taken in a manner that disrupts the spirit of the purpose it was created. Retaliation of any sort for filing a claim of harassment will not be tolerated.

C. How to Report

All reporting to be done through email at www.vedanta.ethicspoint.com or vedanta.whistleblower@vedanta.co.in or at toll free no. 000 800 100 1681.

The decision of the concerned Committee in this regard shall be final and binding, however it will not supersede the local laws. It will be responsible for includes (but not exhaustive of):

- a) Making the complaint and any accused individual(s) aware of the gravity of misconduct
- b) Arrangement of immediate investigation of alleged misconduct
- c) Making recommendations for remediation to designated company officials
- d) Exploring informal means of resolving potential harassment
- e) Notifying appropriate authorities when alleged infractions exceed the power or right of the company to address (such as but not limited to criminal).

D. Escalations & classification of Disciplinary Action

All individual team members, managers, and leaders will be subject to disciplinary action, up to and including termination, for any act of harassment they commit. Although disciplinary action will be at the discretion of the concerned Committee specific to each case after the investigation, it can generally be classified into 4 levels. The repercussions are not restricted by levels and does not follow any order of escalation. In other words, the severity and the recurrence (each individually as well as combined) of the act defines the disciplinary actions not the other way round. The levels are as follows:

- **Level 1: First time occurrences of inappropriate behaviour.** An act out of character. After formal investigation, co-workers still feel comfortable working with the offender. The attempt will be to sensitize first and facilitate formal apology towards inflicted parties. However, first time occurrences are only applicable to minor infractions. Severe infractions, despite of its recurrence will be handled as described in the 4th level as mentioned below. Additionally, the term 'out of character' is not to be used as a mean of defence. The severity is to be decided by the formal committee only.
- **Level 2: Recurring socially inappropriate behaviour.** It can lead to suspension (Paid/Unpaid based on country), mandatory course on Inclusivity, formal apology towards inflicted parties, written admonition, potential transfer to another team and even has potential of termination.
- **Level 3: Major infraction,** including retaliation, or recurring socially inappropriate behaviour after a written admonition can lead to termination of employment. Restating that the scope of the level is not limited by written admonition etc. by any way, and depends on severity and recurrence.
- **Level 4: Serious cases, including any criminal offence.** Can lead to termination of employment and perpetrator will be reported to the Police/Authorities

E. Training & Guidance

Training and guidance on understanding, preventing, and dealing with discrimination and sexual harassment will be provided to department HR, line managers and individual team members. will be provided by company.

F. Accountability & Review

The Ethics Committee will review this policy annually and recommend appropriate revisions to the Board as may deem necessary. Each Vedanta business shall implement this policy. The Ethics Committee will be held accountable for the policy's associated performance and will be responsible for its implementation.

Date: August 04, 2023